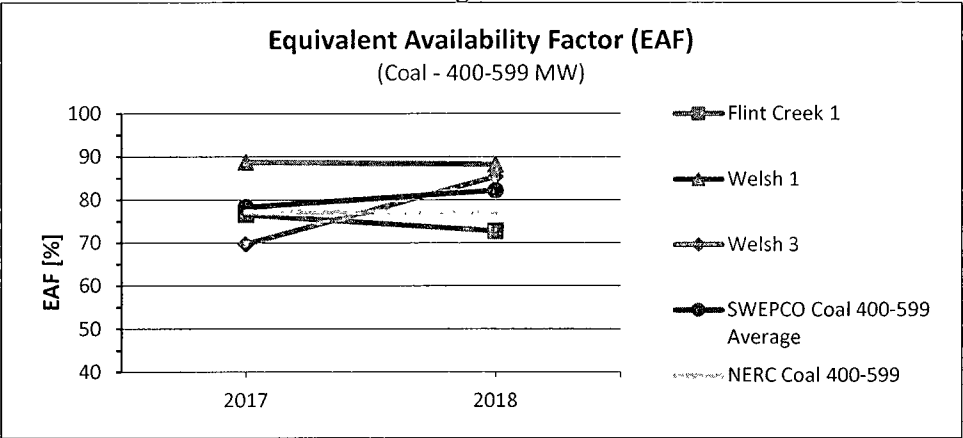


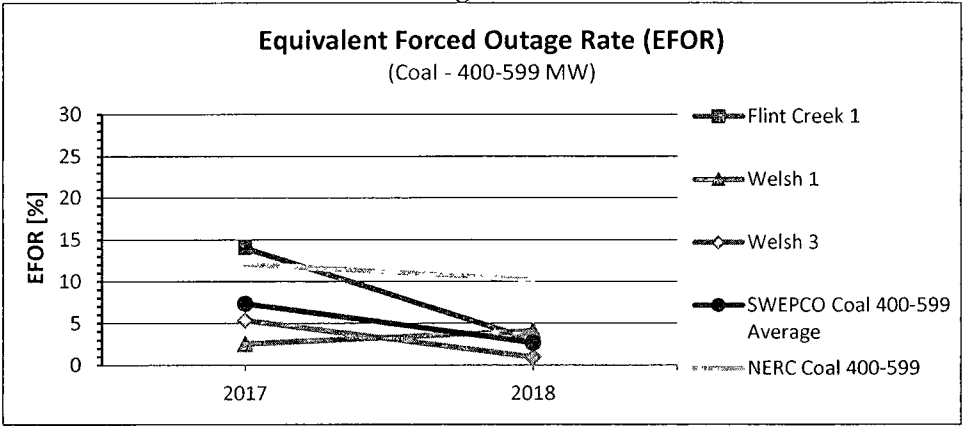
**SWEPCO SOLID FUEL UNITS**

**COAL UNITS 400-599 MW**

**Figure 1**



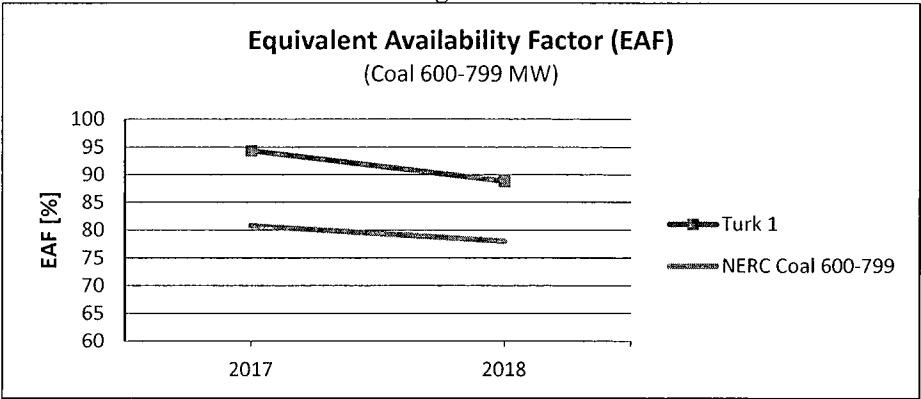
**Figure 2**



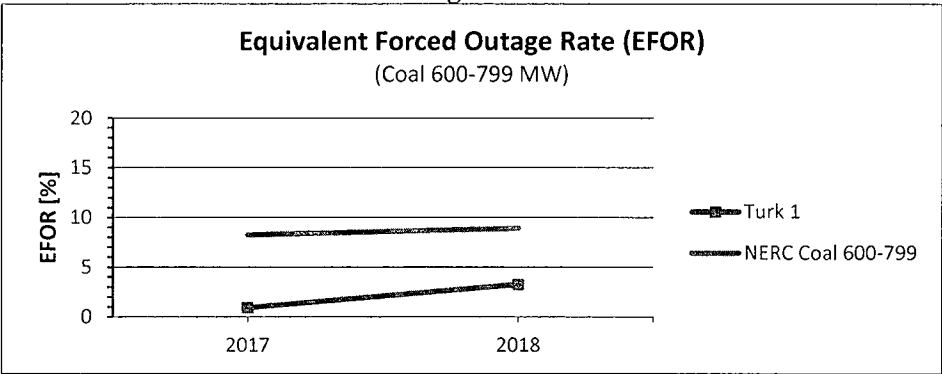
SWEPCO SOLID FUEL UNITS

COAL UNITS 600-799 MW

**Figure 3**



**Figure 4**



SWEPCO SOLID FUEL UNITS

LIGNITE UNITS

Figure 5

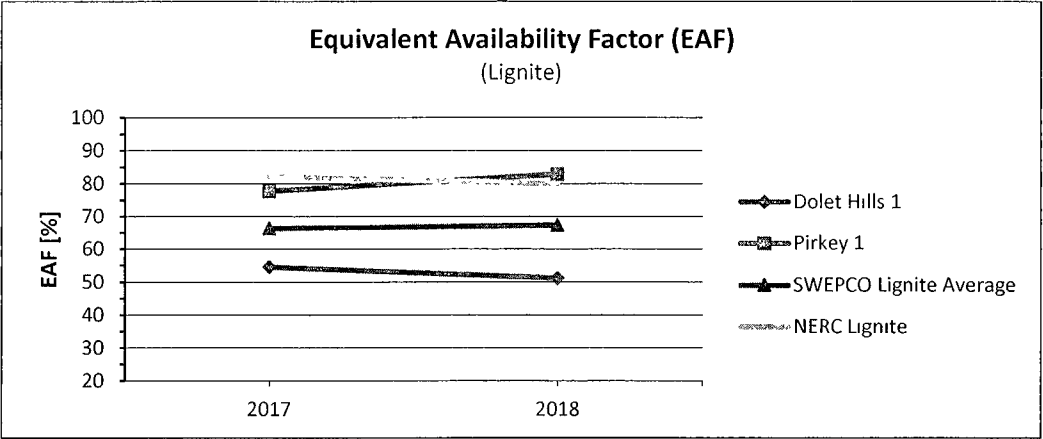
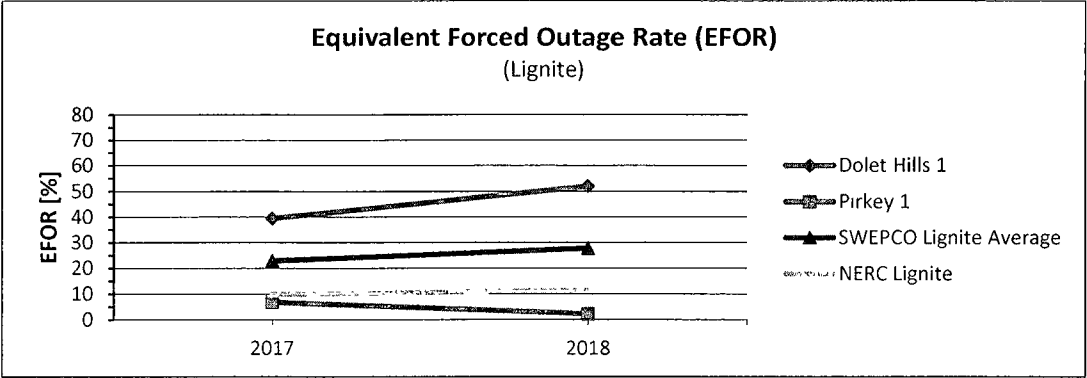


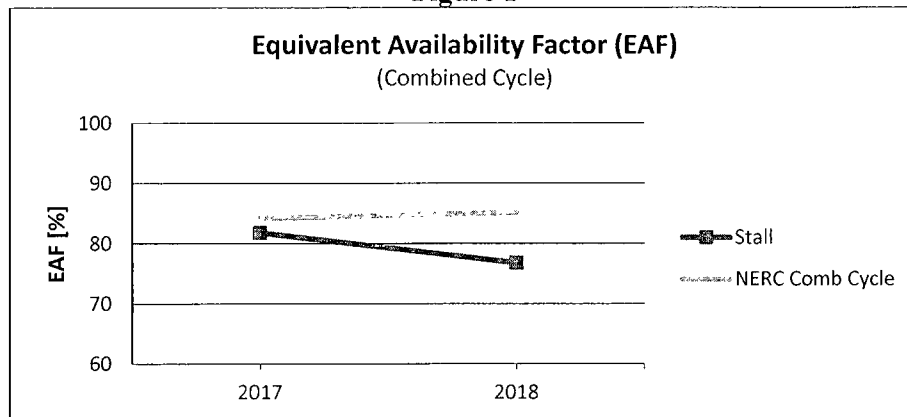
Figure 6



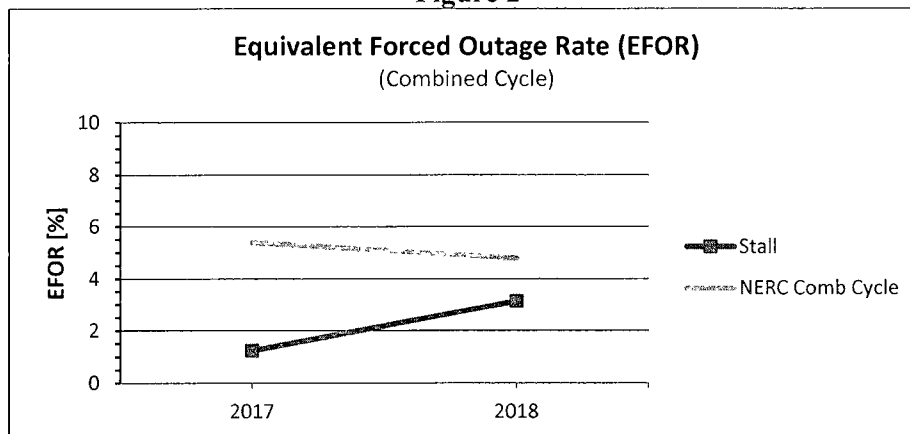
**SWEPKO NATURAL GAS UNITS**

**COMBINED CYCLE UNITS**

**Figure 1**



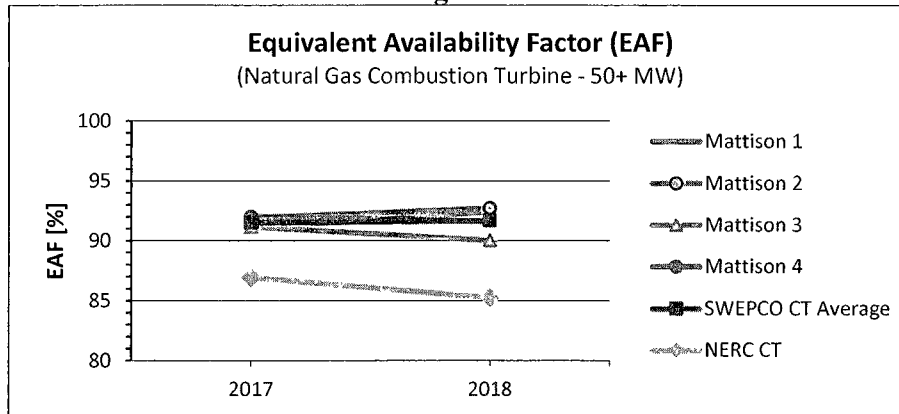
**Figure 2**



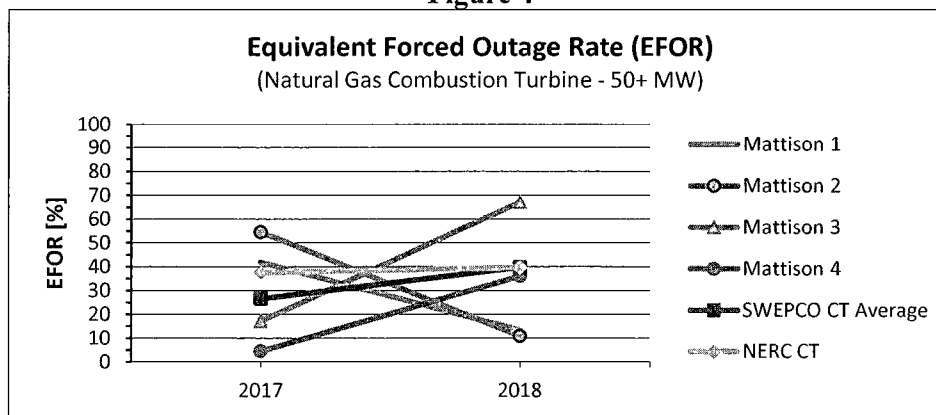
**SWEPCO NATURAL GAS UNITS**

**COMBUSTION TURBINE UNITS 50+ MW**

**Figure 3**



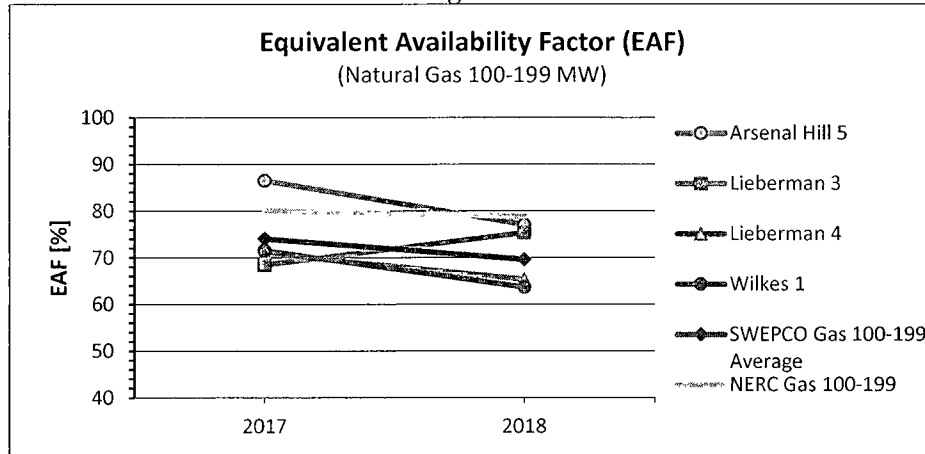
**Figure 4**



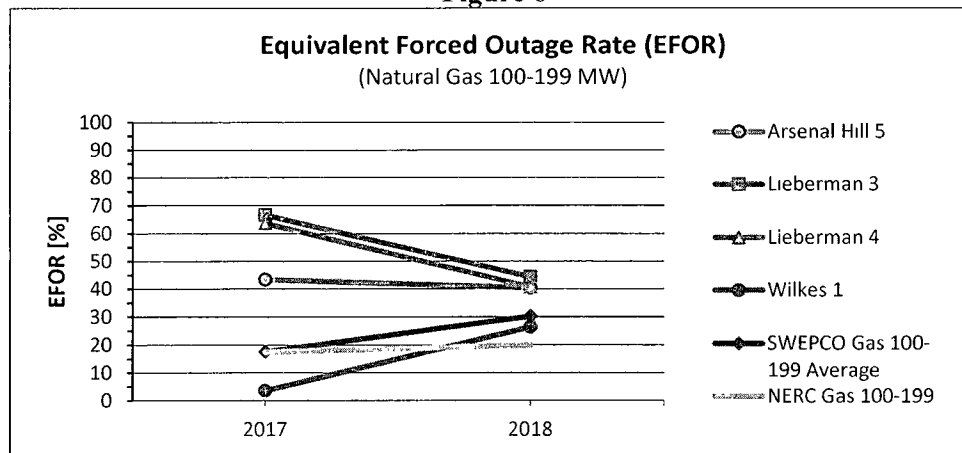
**SWEPCO NATURAL GAS UNITS**

**NATURAL GAS 100-199 MW**

**Figure 5**



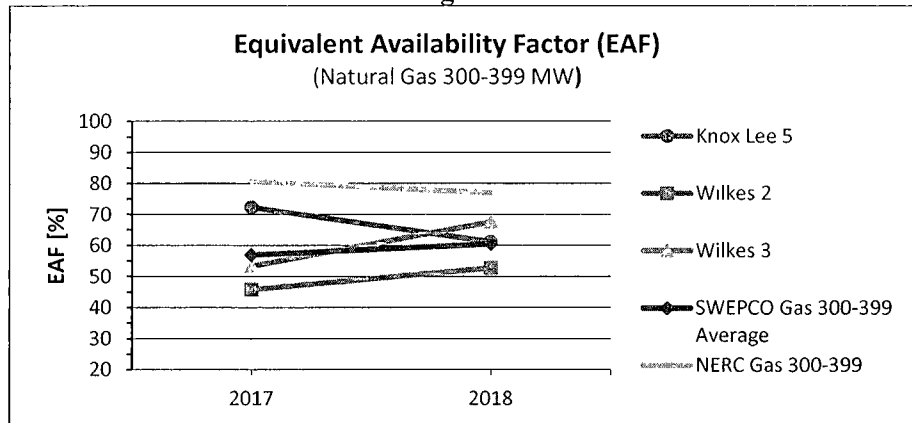
**Figure 6**



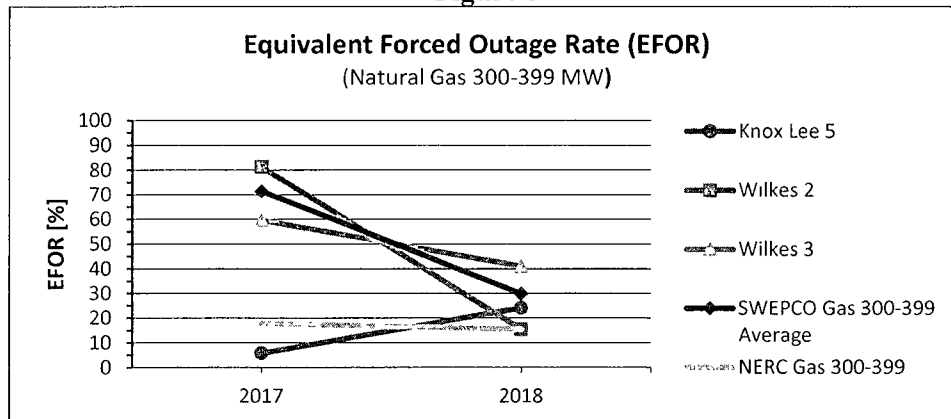
**SWEPKO NATURAL GAS UNITS**

**NATURAL GAS 300-399 MW**

**Figure 7**



**Figure 8**



### **EXECUTIVE SUMMARY OF DYLAN W. D'ASCENDIS**

Mr. D'Ascendis' Direct Testimony establishes that a Return on Equity (referred to as the "ROE" or the "Cost of Equity") rate in the range of 10.32% to 11.43% is necessary for Southwestern Electric Power Company ("SWEPCO" or the "Company") to provide a reasonable return to its equity investors. His recommended range considers a variety of factors that affect the required return to equity investors including:

- The multiple analytical approaches that were evaluated to develop his recommended range; and
- How the Cost of Equity is affected by the Company's relative small size and its lower credit rating.

Mr. D'Ascendis' Direct Testimony presents multiple analytical techniques for the purposes of estimating the Company's ROE. To develop his recommendation, he estimated the ROE using the Constant Growth Discounted Cash Flow ("DCF") model, the Risk Premium Model ("RPM"), and the Capital Asset Pricing Model ("CAPM"), and applied those methodologies to a proxy group of electric utilities ("Utility Proxy Group"), as well as to a proxy group of non-price regulated companies similar in total risk to the Utility Proxy Group ("Non-Price Regulated Proxy Group").

Together with the Schedules attached to Mr. D'Ascendis' Direct Testimony, this evidence demonstrates that a Cost of Equity rate in the range of 10.32% to 11.43% is reasonable, and should be adopted for SWEPCO in order to provide the Company with an opportunity to generate earnings that maintain a reasonable return to its equity investors.



PUBLIC UTILITY COMMISSION OF TEXAS

APPLICATION OF  
SOUTHWESTERN ELECTRIC POWER COMPANY  
FOR AUTHORITY TO CHANGE RATES

DIRECT TESTIMONY OF  
DYLAN W. D'ASCENDIS  
FOR  
SOUTHWESTERN ELECTRIC POWER COMPANY

OCTOBER 2020

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## **LIST OF SCHEDULES**

Schedule DWD-1:	Summary of Overall Cost of Capital and Return on Equity
Schedule DWD-2:	Financial Profile of Southwestern Electric Power Company and the Utility Proxy Group
Schedule DWD-3:	Application of the Discounted Cash Flow Model
Schedule DWD-4:	Application of the Risk Premium Model
Schedule DWD-5:	Application of the Capital Asset Pricing Model
Schedule DWD-6:	Basis of Selection for the Non-Price Regulated Companies Comparable in Total Risk to the Utility Proxy Group
Schedule DWD-7:	Application of Cost of Common Equity Models to the Non- Price Regulated Proxy Group
Schedule DWD-8:	Derivation of the Indicated Size Premium for Southwestern Electric Power Company Relative to the Utility Proxy Group

1                                   **I. INTRODUCTION AND PURPOSE**

2       Q.     PLEASE STATE YOUR NAME, AFFILIATION, AND BUSINESS ADDRESS.

3       A.     My name is Dylan W. D'Ascendis. I am employed by ScottMadden, Inc. as  
4             Director. My business address is 3000 Atrium Way, Suite 241, Mount Laurel, NJ  
5             08054.

6       Q.     ON WHOSE BEHALF ARE YOU SUBMITTING THIS TESTIMONY?

7       A.     I am submitting this direct testimony (referred to throughout as my "Direct  
8             Testimony") before the Public Utility Commission of Texas ("Commission") on  
9             behalf of Southwestern Electric Power Company ("SWEPCO" or the "Company").

10      Q.     PLEASE SUMMARIZE YOUR PROFESSIONAL EXPERIENCE AND  
11             EDUCATIONAL BACKGROUND.

12      A.     I have offered expert testimony on behalf of investor-owned utilities in over 20 state  
13             regulatory commissions in the United States, the Federal Energy Regulatory  
14             Commission, the Alberta Utility Commission, and one American Arbitration  
15             Association panel on issues including, but not limited to, common equity cost rate,  
16             rate of return, valuation, capital structure, class cost of service, and rate design.

17             On behalf of the American Gas Association ("AGA"), I calculate the AGA  
18             Gas Index, which serves as the benchmark against which the performance of the  
19             American Gas Index Fund ("AGIF") is measured on a monthly basis. The AGA Gas  
20             Index and AGIF are a market capitalization weighted index and mutual fund,  
21             respectively, comprised of the common stocks of the publicly traded corporate  
22             members of the AGA.

1 I am a member of the Society of Utility and Regulatory Financial Analysts  
2 (“SURFA”). In 2011, I was awarded the professional designation "Certified Rate of  
3 Return Analyst" by SURFA, which is based on education, experience, and the  
4 successful completion of a comprehensive written examination.

5 I am also a member of the National Association of Certified Valuation  
6 Analysts (“NACVA”) and was awarded the professional designation “Certified  
7 Valuation Analyst” by the NACVA in 2015.

8 I am a graduate of the University of Pennsylvania, where I received a  
9 Bachelor of Arts degree in Economic History. I have also received a Master of  
10 Business Administration with high honors and concentrations in Finance and  
11 International Business from Rutgers University.

12 The details of my educational background and expert witness appearances are  
13 shown in Appendix A.

14 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

15 A. The purpose of my testimony is to present evidence on behalf of SWEPCO and  
16 recommend an ROE for its Texas jurisdictional rate base, and to assess the  
17 Company’s actual capital structure ratios.

18 Q. HAVE YOU PREPARED SCHEDULES IN SUPPORT OF YOUR  
19 RECOMMENDATION?

20 A. Yes. I have prepared Schedules DWD-1 through DWD-8, which were prepared by  
21 me or under my direction.

22

1 **II. SUMMARY**

2 Q. WHAT IS YOUR RECOMMENDED ROE FOR SWEPCO?

3 A. I recommend that the Commission authorize SWEPCO the opportunity to earn an  
4 ROE of 10.35% on its jurisdictional rate base within a reasonable range of 10.32% to  
5 11.43%. The ratemaking capital structure and cost of long-term debt is sponsored by  
6 Company Witness Hawkins. The overall rate of return is summarized on page 1 of  
7 Schedule DWD-1 and in Table 1 below:

8 **Table 1: Summary of Recommended Weighted Average Cost of Capital**

Type of Capital	Ratios	Cost Rate	Weighted Cost Rate
Long-Term Debt	50.63%	4.18%	2.11%
Common Equity	<u>49.37%</u>	10.35%	<u>5.11%</u>
Total	<u>100.00%</u>		<u>7.22%</u>

9 Q. PLEASE SUMMARIZE YOUR RECOMMENDED ROE.

10 A. My recommended ROE of 10.35% is summarized on page 2 of Schedule DWD-1. I  
11 have assessed the market-based common equity cost rates of companies of relatively  
12 similar, but not necessarily identical, risk to SWEPCO. Using companies of  
13 relatively comparable risk as proxies is consistent with the principles of fair rate of  
14 return established in the *Hope*<sup>1</sup> and *Bluefield*<sup>2</sup> decisions. No proxy group can be  
15 identical in risk to any single company. Consequently, there must be an evaluation of  
16 relative risk between the company and the proxy group to determine if it is  
17 appropriate to adjust the proxy group's indicated rate of return.

---

1 *Federal Power Comm'n v Hope Natural Gas Co.*, 320 U.S. 591 (1944) ("*Hope*").

2 *Bluefield Water Works Improvement Co. v Public Serv. Comm'n*, 262 U.S. 679 (1922) ("*Bluefield*").

My recommendation results from applying several cost of common equity models, specifically the DCF model, the RPM, and the CAPM, to the market data of the Utility Proxy Group whose selection criteria will be discussed below. In addition, I applied the DCF model, RPM, and CAPM to the Non-Price Regulated Proxy Group. The results derived from each are as follows:

**Table 2: Summary of Common Equity Cost Rates**

Discounted Cash Flow Model	8.73%
Risk Premium Model	10.54%
Capital Asset Pricing Model	12.46%
Cost of Equity Models Applied to Comparable Risk, Non-Price Regulated Companies	<u>12.12%</u>
Indicated Range of Common Equity Cost Rates Before Adjustments	9.85% - 10.96%
Size Adjustment	0.20%
Credit Risk Adjustment	<u>0.27%</u>
Indicated Range of Common Equity Cost Rates after Adjustment	<u>10.32% - 11.43%</u>
Recommended Cost of Common Equity	<u>10.35%</u>

The indicated range of common equity cost rates applicable to the Utility Proxy Group is between 9.85% and 10.96% before any Company-specific adjustments. The 9.85% low end of the range is calculated by taking the average model result (10.96%), and averaging that with the lowest model result (8.73%). The 10.96% high end of the range is the average of all model results.

I then adjusted the indicated common equity cost rate upward by 0.20% and 0.27% to reflect the Company's smaller relative size and riskier bond rating, as compared to the Utility Proxy Group. These adjustments resulted in a Company-specific indicated range of common equity cost rates between 10.32% and 11.43%.

DIRECT TESTIMONY  
DYLAN W. D'ASCENDIS

1           Given the Utility Proxy Group and Company-specific ranges of common equity cost  
2           rates, my recommended ROE for SWEPCO is 10.35%.

3    Q.    WHY DID YOU USE THE MIDPOINT BETWEEN YOUR AVERAGE MODEL  
4           RESULT AND YOUR LOWEST MODEL RESULT AS THE BOTTOM OF YOUR  
5           INDICATED REASONABLE RANGE BEFORE ADJUSTMENT?

6    A.    As will be explained in detail below, the turmoil in markets attributable to the  
7           COVID-19 pandemic has increased risk for the entire economy generally, and  
8           utilities, specifically. Key takeaways include:

- 9           •    The full impact and duration of the COVID-19 pandemic are  
10           unknown, and outcomes are highly uncertain;
- 11           •    This uncertainty increases volatility. Volatility increases the chances  
12           of investment losses. As a result, investors flee to bonds to limit their  
13           investment losses, which is known as “the flight to safety”. Increased  
14           levels of bond purchases increase their price, and drive down their  
15           yields, *i.e.*, interest rates. Because of this, the current low-interest  
16           rate environment is due to increased volatility in the market, and not a  
17           steady lowering of the cost of debt over time;
- 18           •    The same increased market volatility that caused investors’ “flight to  
19           safety” also created a situation where utilities are traded similar to the  
20           S&P 500. These correlated returns of utility stocks and market  
21           indices increase Beta coefficients (a measure of risk), and by  
22           extension, investor-required returns; and
- 23           •    Investor-influencing publications such as *Blue Chip Financial*  
24           *Forecasts* (“*Blue Chip*”), Standard & Poor’s (“S&P”), and Moody’s  
25           Investor Service (“Moody’s”) have recognized the risks of the  
26           COVID-19 pandemic, and have reflected them in their analyses.

27           My recommendation to use the lower end of the range of my results for the  
28           bottom of my Utility Proxy Group reasonable range is designed to be conservative  
29           given that volatility and uncertainty.

### III. CAPITAL MARKET CONDITIONS

1 Q. PLEASE SUMMARIZE THE RECENT CAPITAL MARKET CONDITIONS.

2 A. The recent, dramatic shifts in the capital markets brought about by COVID-19 cannot  
3 be overstated. Central banks have implemented multiple policies to address the  
4 financial market instability. The Federal Reserve reduced the overnight lending rate  
5 to a target range of 0.00% to 0.25%, announced plans to increase holdings of  
6 Treasury securities and agency mortgage-backed securities by a total of \$700  
7 billion,<sup>3</sup> established a facility to facilitate lending to small businesses via the Small  
8 Business Administration's Paycheck Protection Program ("PPP") by providing term  
9 financing backed by PPP loans,<sup>4</sup> and took additional actions to provide up to \$2.3  
10 trillion in loans to support the economy.<sup>5</sup>

11 The U.S. Government also acted to attempt to address the unstable financial  
12 markets. The Coronavirus Aid, Relief, and Economic Security Act, provided \$2.4  
13 trillion in economic stimulus and the PPP and Health Care Enhancement Act  
14 provided an additional \$484 billion in emergency aid.<sup>6</sup>

15 Despite government and central bank actions, the 30-Year Treasury bond  
16 yield has remained highly volatile, as seen in its coefficient of variation<sup>7</sup> (see Chart  
17 1, below).

---

3 Federal Reserve Press Release, March 15, 2020.

4 Federal Reserve Press Release, April 6, 2020.

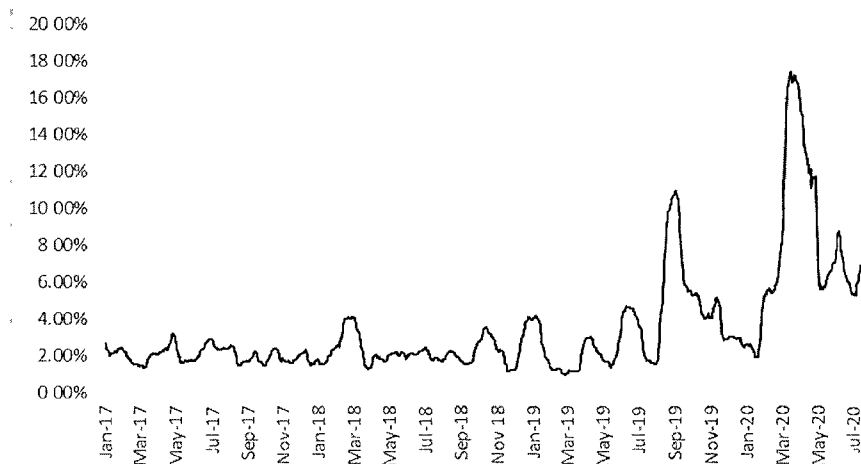
5 Federal Reserve Press Release, April 9, 2020.

6 S&P Global Market Intelligence, *Trump signs \$484B coronavirus relief package into law*, April 24, 2020.

7 The coefficient of variation is used by investors and economists to determine volatility.



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**Chart 1: Coefficient of Variation in 30-Year Treasury Yields<sup>8</sup>**

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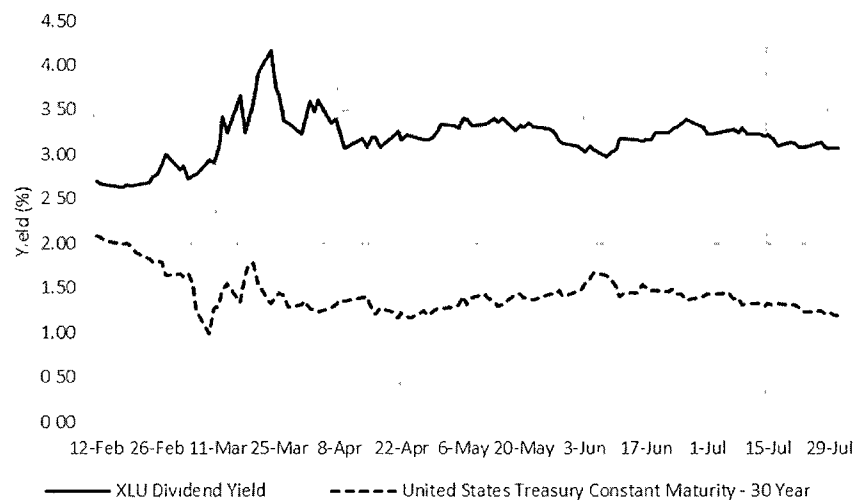
12

Investor reactions to the market instability also are reflected in the “yield spread”, or the difference between dividend yields and long-term Government bond yields. As the 30-year Treasury yield fell, utility dividend yields increased, widening the yield spread (*see* Chart 2, below). That pattern, in which utility dividend yields move in the opposite direction of interest rates, reflects the disjointed capital market, and investors’ reactions to it. Under more “normal” conditions, dividend yields tend to be directionally related to Treasury yields, such that the yield spread remains relatively constant. But that relationship has a limit. Investors will not continuously bid up utility prices as interest rates fall; the widening yield spread demonstrates as much.

<sup>8</sup> Source: Bloomberg Professional Service.

1

**Chart 2: Utility Dividend Yields vs. 30-Year Treasury Yields<sup>9</sup>**



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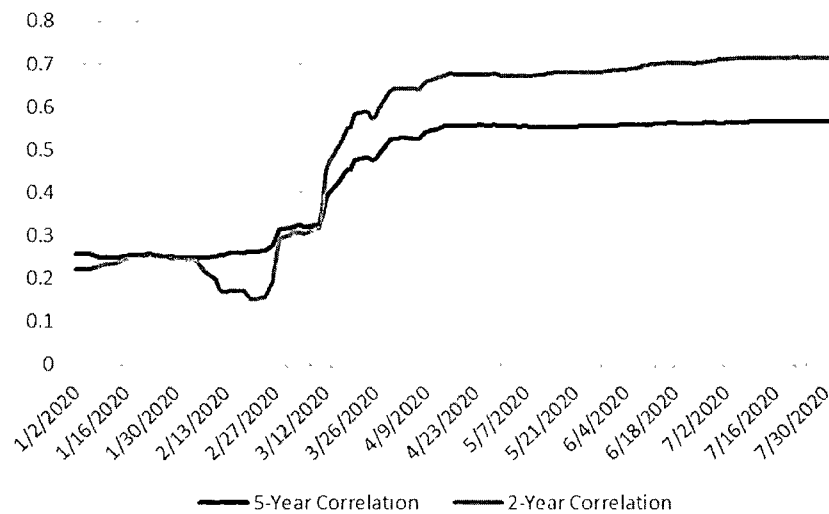
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11

Additionally, I assessed the correlation of the changes in prices in the XLU<sup>10</sup> with the changes in prices of the S&P 500 to determine whether there was any relationship between the two during the current crisis. As shown in Chart 3 below, as the Coronavirus threat became apparent (*i.e.*, mid-February 2020), the correlation between the price changes of the XLU and the price changes of the S&P 500 increased from near 0.20 to near 0.70 (using a two-year correlation, consistent with Bloomberg Beta calculations) and from 0.25 to nearly 0.60 (using a five-year correlation, consistent with *Value Line Investment Survey's* ("*Value Line*") Beta calculations).

<sup>9</sup> Source: S&P Capital IQ.  
<sup>10</sup> The Utilities Select Sector SPDR® Fund, which serves as a proxy for publicly traded electric utility stocks.

**Chart 3: Correlation Between Price Movements of the XLU and S&P 500 Since January 2020<sup>11</sup>**



This increase in correlation between price changes for the XLU and those for the S&P 500 is not surprising. As Morningstar recently explained, during volatile markets there often is little distinction in risk across assets or portfolios. That is, “correlations go to 1.”<sup>12</sup> When that happens, utility stocks lose their “defensive” quality.

Q. ARE YOU AWARE OF ANY INVESTOR-INFLUENCING PUBLICATIONS THAT INDICATED THE COST OF CAPITAL HAS INCREASED DURING THE RECENT MARKET DISLOCATION?

A. Yes. The April 10, 2020 edition of *Blue Chip Economic Indicators* (“BCEI”) described the pandemic’s effect on the general economy as follows:

<sup>11</sup> Source: S&P Capital IQ.

<sup>12</sup> Morningstar, *Correlations Going to 1: Amid Market Collapse, U.S. Stock Fund Factors Show Little Differentiation*, March 6, 2020.

1 This month's *Blue Chip Economic Indicators* panel's forecast for real  
2 GDP in Q2 2020 is estimated to set a historical record – by far: a  
3 plunge of -24.5% SAAR [Seasonally Adjusted Annual Rate]. The  
4 previous record was -10.0% in Q1 1958; quarterly data began in Q1  
5 1947. In its February forecast, the panel had projected Q2 growth to  
6 be 1.9% SAAR and in March 1.0%.<sup>13</sup>

7 BCEI further explained that it expects the “easing of the current outbreak of  
8 the disease and accompanying social distancing practices will support a visible  
9 recovery in the second half of this year and on into 2021.” At the same time, BCEI  
10 cautioned that “the speed of the recovery would be nowhere near the magnitude of  
11 the drop,” and according to its consensus forecast, “real GDP would not recover to its  
12 previous peak until the fourth quarter of 2021.”<sup>14</sup>

13 It is within that broad context that S&P downgraded its outlook on the utility  
14 sector from “Stable” to “Negative”, explaining that it expects a 12.00% contraction  
15 in GDP during the second quarter of 2020, reducing commercial and industrial  
16 usage.<sup>15</sup>

17 Although utilities have some discretion as to how they may reduce capital  
18 investments while maintaining safe and reliable service, in a prolonged recession  
19 they may consider reducing dividend payments. As S&P notes, “[t]here is precedent  
20 that during times of high financial stress, utilities have reduced their dividends and  
21 we would expect that the industry, if necessary, would use this lever, acting  
22 prudently to preserve credit quality.”<sup>16</sup> It is through such “levers” that S&P expects  
23 the sector to remain a high quality, investment grade industry.<sup>17</sup>

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13 Blue Chip Economic Indicators, April 10, 2020, at 1. [clarification added]

14 *Ibid.*

15 S&P Global Ratings, *COVID-19: The Outlook For North American Regulated Utilities Turns Negative*, April 2, 2020, at 1, 6-7.

16 *Ibid.*, at 9.

17 *Ibid.*

1           Moody’s similarly observed that “[i]n a prolonged economic downturn,  
2           boards of directors are likely to review dividend plans as an option to conserve  
3           cash.”<sup>18</sup> Moody’s expects companies with higher payout ratios as more likely to  
4           reduce dividends, and sees the potential for average dividend payout ratios to  
5           increase to about 80.00% from a median of 63.00% in 2019.<sup>19</sup> In Moody’s view, the  
6           ability to reduce dividends provides utilities “with a significant source of internal  
7           cash that could help them offset the impact of a potentially prolonged coronavirus-  
8           related economic downturn.”<sup>20</sup>

9           S&P and Moody’s both point to reducing the growth in dividends as a means  
10          of preserving credit quality in the event of a prolonged economic downturn. Doing  
11          so, however, comes at the expense of equity investors. The potential tension between  
12          maintaining credit quality and preserving dividends is another reason the Cost of  
13          Equity may increase.

14          In short, during a period of heightened and possibly prolonged market  
15          uncertainty, observable market information makes clear that utility investors now  
16          face greater risks and require higher returns.

17

---

18       Moody’s Investors Service, *Dividends a major source of cash if coronavirus downturn is prolonged*,  
April 6, 2020, at 1.

19       *Ibid.*, at 2-3.

20       *Ibid.*, at 1.

1 IV. GENERAL PRINCIPLES

2 Q. WHAT GENERAL PRINCIPLES HAVE YOU CONSIDERED IN ARRIVING AT  
3 YOUR RECOMMENDED COMMON EQUITY COST RATE OF 10.35%?

4 A. In unregulated industries, marketplace competition is the principal determinant of the  
5 price of products or services. For regulated public utilities, regulation must act as a  
6 substitute for marketplace competition. Assuring that the utility can fulfill its  
7 obligations to the public, while providing safe and reliable service at all times,  
8 requires a level of earnings sufficient to maintain the integrity of presently invested  
9 capital. Sufficient earnings also permit the attraction of needed new capital at a  
10 reasonable cost, for which the utility must compete with other firms of comparable  
11 risk, consistent with the fair rate of return standards established by the U.S. Supreme  
12 Court in the previously cited *Hope* and *Bluefield* cases. Consequently, marketplace  
13 data must be relied on in assessing a common equity cost rate appropriate for  
14 ratemaking purposes. Just as the use of market data for the Utility Proxy Group adds  
15 the reliability necessary to inform expert judgment in arriving at a recommended  
16 common equity cost rate, the use of multiple generally accepted common equity cost  
17 rate models also adds reliability and accuracy when arriving at a recommended  
18 common equity cost rate.

19 A. **Business Risk**

20 Q. PLEASE DEFINE BUSINESS RISK AND EXPLAIN WHY IT IS IMPORTANT  
21 FOR DETERMINING A FAIR RATE OF RETURN.

22 A. The investor-required return on common equity reflects investors' assessment of the  
23 total investment risk of the subject firm. Total investment risk is often discussed in

1 the context of business and financial risk.

2 Business risk reflects the uncertainty associated with owning a company's  
3 common stock without the company's use of debt and/or preferred stock financing.  
4 One way of considering the distinction between business and financial risk is to view  
5 the former as the uncertainty of the expected earned return on common equity,  
6 assuming the firm is financed with no debt.

7 Examples of business risks generally faced by utilities include, but are not  
8 limited to, the regulatory environment, mandatory environmental compliance  
9 requirements, customer mix and concentration of customers, service territory  
10 economic growth, market demand, risks and uncertainties of supply, operations,  
11 capital intensity, size, the degree of operating leverage, emerging technologies  
12 including distributed energy resources, the vagaries of weather, and the like, all of  
13 which have a direct bearing on earnings. Although analysts, including rating  
14 agencies, may categorize business risks individually, as a practical matter, such risks  
15 are interrelated and not wholly distinct from one another. Therefore, it is difficult to  
16 specifically and numerically quantify the effect of any individual risk on investors'  
17 required return, *i.e.*, the cost of capital. For determining an appropriate return on  
18 common equity, the relevant issue is where investors see the subject company as  
19 falling within a spectrum of risk. To the extent investors view a company as being  
20 exposed to higher risk, the required return will increase, and vice versa.

21 For regulated utilities, business risks are both long-term and near-term in  
22 nature. Whereas near-term business risks are reflected in year-to-year variability in  
23 earnings and cash flow brought about by economic or regulatory factors, long-term

1 business risks reflect the prospect of an impaired ability of investors to obtain both a  
2 fair rate of return on, and return of, their capital. Moreover, because utilities accept  
3 the obligation to provide safe, adequate, and reliable service at all times (in exchange  
4 for a reasonable opportunity to earn a fair return on their investment), they generally  
5 do not have the option to delay, defer, or reject capital investments. Because those  
6 investments are capital-intensive, utilities generally do not have the option to avoid  
7 raising external funds during periods of capital market distress, if necessary.

8 Because utilities invest in long-lived assets, long-term business risks are of  
9 paramount concern to equity investors. That is, the risk of not recovering the return  
10 on their investment extends far into the future. The timing and nature of events that  
11 may lead to losses, however, also are uncertain and, consequently, those risks and  
12 their implications for the required return on equity tend to be difficult to quantify.  
13 Regulatory commissions (like investors who commit their capital) must review a  
14 variety of quantitative and qualitative data and apply their reasoned judgment to  
15 determine how long-term risks weigh in their assessment of the market-required  
16 return on common equity.

17 **B. Financial Risk**

18 Q. PLEASE DEFINE FINANCIAL RISK AND EXPLAIN WHY IT IS IMPORTANT  
19 IN DETERMINING A FAIR RATE OF RETURN.

20 A. Financial risk is the additional risk created by the introduction of debt and preferred  
21 stock into the capital structure. The higher the proportion of debt and preferred stock  
22 in the capital structure, the higher the financial risk to common equity owners (*i.e.*,  
23 failure to receive dividends due to default or other covenants). Therefore, consistent



1 with the basic financial principle of risk and return, common equity investors require  
2 higher returns as compensation for bearing higher financial risk.

3 Q. CAN BOND AND CREDIT RATINGS BE A PROXY FOR A FIRM'S  
4 COMBINED BUSINESS AND FINANCIAL RISKS TO EQUITY OWNERS (I.E.,  
5 INVESTMENT RISK)?

6 A. Yes, similar bond ratings/issuer credit ratings reflect, and are representative of,  
7 similar combined business and financial risks (*i.e.*, total risk) faced by bond  
8 investors.<sup>21</sup> Although specific business or financial risks may differ between  
9 companies, the same bond/credit rating indicates that the combined risks are roughly  
10 similar from a debtholder perspective. The caveat is that these debtholder risk  
11 measures do not translate directly to risks for common equity.

12 Q. DO RATING AGENCIES ACCOUNT FOR COMPANY SIZE IN THEIR BOND  
13 RATINGS?

14 A. No. Neither S&P nor Moody's have minimum company size requirements for any  
15 given rating level. This means, all else equal, a relative size analysis must be  
16 conducted for equity investments in companies with similar bond ratings.

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21 Risk distinctions within S&P's bond rating categories are recognized by a plus or minus, e.g., within the A category, an S&P rating can be an A+, A, or A-. Similarly, risk distinction for Moody's ratings are distinguished by numerical rating gradations, e.g., within the A category, a Moody's rating can be A1, A2 and A3.

1                                    **V.    SWEPCO AND THE UTILITY PROXY GROUP**

2    Q.    ARE YOU FAMILIAR WITH SWEPCO'S OPERATIONS?

3    A.    Yes. SWEPCO provides electric services to approximately 540,000 retail customers  
4           in Texas, Louisiana, and Arkansas.<sup>22</sup> SWEPCO has long-term issuer ratings of Baa2  
5           from Moody's and A- from S&P. SWEPCO is not publicly-traded as it comprises an  
6           operating subsidiary of American Electric Power Company, Inc. ("AEP" or the  
7           "Parent"), which has electric distribution operations in 11 states<sup>23</sup> and serves  
8           approximately 5.5 million customers, and is publicly-traded under ticker symbol  
9           AEP.

10           Page 1 of Schedule DWD-2 contains comparative capitalization and financial  
11           statistics for SWEPCO for the years 2015 to 2019.<sup>24</sup> During the five-year period  
12           ending 2019, the historically achieved average earnings rate on book common equity  
13           for SWEPCO averaged 7.06%. The average common equity ratio based on total  
14           permanent capital (excluding short-term debt) was 47.97%, and the average dividend  
15           payout ratio was 58.18%.

16           Total debt to earnings before interest, taxes, depreciation, and amortization  
17           for the years 2015 to 2019 ranges between 3.92 and 5.09 times, with an average of  
18           4.76 times. Funds from operations to total debt range from 11.49% to 19.40%, with  
19           an average of 15.58%.

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22        *See*, American Electric Power Company Inc., SEC Form 10-K at 3 (Dec. 31, 2019). The Company  
         also provides wholesale electric service to municipal and electric cooperative customers who serve  
         additional retail customers.

23        *See*, American Electric Power Company Inc., SEC Form 10-K at 1 (Dec. 31, 2019). In addition to  
         Texas, AEP also serves customers in Arkansas, Indiana, Kentucky, Louisiana, Michigan, Ohio,  
         Oklahoma, Tennessee, Virginia, and West Virginia.

24        Source: SWEPCO FERC Form 1.

1 Q. PLEASE EXPLAIN HOW YOU CHOSE THE COMPANIES IN THE UTILITY  
2 PROXY GROUP.

3 A. The companies selected for the Utility Proxy Group met the following criteria:

- 4 (i) They were included in the Eastern, Central, or Western Electric Utility Group  
5 of *Value Line* (Standard Edition);
- 6 (ii) They have 70% or greater of fiscal year 2019 total operating income derived  
7 from, and 70% or greater of fiscal year 2019 total assets attributable to,  
8 regulated electric operations;
- 9 (iii) They are vertically integrated (*i.e.*, utilities that own and operate regulated  
10 generation, transmission, and distribution assets);
- 11 (iv) At the time of preparation of this testimony, they had not publicly announced  
12 that they were involved in any major merger or acquisition activity (*i.e.*, one  
13 publicly-traded utility merging with or acquiring another) or any other major  
14 development;
- 15 (v) They have not cut or omitted their common dividends during the five years  
16 ended 2019 or through the time of preparation of this testimony;
- 17 (vi) They have *Value Line* and Bloomberg Professional Services (“Bloomberg”)  
18 adjusted Betas;
- 19 (vii) They have positive *Value Line* five-year dividends per share (“DPS”) growth  
20 rate projections; and
- 21 (viii) They have *Value Line*, Zacks, or Yahoo! Finance consensus five-year  
22 earnings per share (“EPS”) growth rate projections.

23 The following 14 companies met these criteria:

1

**Table 3: Utility Proxy Group Companies**

Company Name	Ticker Symbol
ALLETE, Inc.	ALE
Alliant Energy Corporation	LNT
Ameren Corporation	AEE
Duke Energy Corporation	DUK
Edison International	EIX
Entergy Corporation	ETR
IDACORP, Inc.	IDA
NorthWestern Corporation	NWE
OGE Energy Corporation	OGE
Otter Tail Corporation	OTTR
Pinnacle West Capital Corporation	PNW
PNM Resources, Inc.	PNM
Portland General Electric Co.	POR
Xcel Energy, Inc.	XEL

2 Q. PLEASE DESCRIBE SCHEDULE DWD-2, PAGE 2.

3 A. Page 2 of Schedule DWD-2 contains comparative capitalization and financial  
4 statistics for the Utility Proxy Group for the years 2015 to 2019.

5 During the five-year period ending 2019, the historically achieved average  
6 earnings rate on book common equity for the group averaged 8.60%, the average  
7 common equity ratio based on total permanent capital (excluding short-term debt)  
8 was 48.33%, and the average dividend payout ratio was 60.94%.

9 Total debt to earnings before interest, taxes, depreciation, and amortization  
10 for the years 2015 to 2019 ranges between 4.03 and 5.27 times, with an average of  
11 4.62 times. Funds from operations to total debt range from 15.07% to 23.09%, with  
12 an average of 19.47%.

1

**VI. CAPITAL STRUCTURE**

2 Q. WHAT IS SWEPCO'S REQUESTED CAPITAL STRUCTURE?

3 A. SWEPCO's requested capital structure consists of 50.63% long-term debt and  
4 49.37% common equity. SWEPCO's requested capital structure is its actual capital  
5 structure at March 31, 2020, as testified to by Company Witness Hawkins.

6 Q. DOES SWEPCO HAVE A SEPARATE CAPITAL STRUCTURE THAT IS  
7 RECOGNIZED BY INVESTORS?

8 A. Yes. SWEPCO is a separate corporate entity that has its own capital structure and  
9 issues its own debt. SWEPCO's actual capital structure is reflected in registrations  
10 of its debt with the Securities Exchange Commission.

11 Q. WHAT ARE THE TYPICAL SOURCES OF CAPITAL COMMONLY  
12 CONSIDERED IN ESTABLISHING A UTILITY'S CAPITAL STRUCTURE?

13 A. Common equity and long-term debt are commonly considered in establishing a  
14 utility's capital structure because they are the typical sources of capital financing a  
15 utility's rate base.

16 Q. PLEASE EXPLAIN.

17 A. Long-lived assets are typically financed with long-lived securities, so that the overall  
18 term structure of the utility's long-term liabilities (both debt and equity) closely  
19 match the life of the assets being financed. As stated by Brigham and Houston:

20 In practice, firms don't finance each specific asset with a type of  
21 capital that has a maturity equal to the asset's life. However,  
22 academic studies do show that most firms tend to finance short-term

1           assets from short-term sources and long-term assets from long-term  
2           sources.<sup>25</sup>

3           Whereas short-term debt has a maturity of one year or less, long-term debt  
4           may have maturities of 30 years or longer. Although there are practical financing  
5           constraints, such as the need to “stagger” long-term debt maturities, the general  
6           objective is to extend the average life of long-term debt. Still, long-term debt has a  
7           finite life, which is likely to be less than the life of the assets included in rate base.  
8           Common equity, on the other hand, is outstanding into perpetuity. Thus, common  
9           equity more accurately matches the life of the going concern of the utility, which is  
10          also assumed to operate in perpetuity. Consequently, it is both typical and important  
11          for utilities to have significant proportions of common equity in their capital  
12          structures.

13   Q.   WHY IS IT IMPORTANT THAT THE COMPANY’S ACTUAL CAPITAL  
14          STRUCTURE, CONSISTING OF 50.63% LONG-TERM DEBT AND 49.37%  
15          COMMON EQUITY, BE AUTHORIZED IN THIS PROCEEDING?

16   A.   In order to provide safe, reliable, and affordable service to its customers, SWEPCO  
17          must meet the needs and serve the interests of its various stakeholders, including  
18          customers, shareholders, and bondholders. The interests of these stakeholder groups  
19          are aligned with maintaining a healthy balance sheet, strong credit ratings, and a  
20          supportive regulatory environment, so that the Company has access to capital on  
21          reasonable terms in order to make necessary investments.

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25       Eugene F. Brigham and Joel F. Houston, Fundamentals of Financial Management, Concise 4<sup>th</sup> Ed., Thomson South-Western, 2004, at 574.

1 Safe and reliable service cannot be maintained at a reasonable cost if utilities  
2 do not have the financial flexibility and strength to access competitive financing  
3 markets on reasonable terms. The authorization of a capital structure that understates  
4 the Company's actual common equity will weaken the financial condition of its  
5 operations and adversely impact the Company's ability to address expenses and  
6 investments, to the detriment of customers and shareholders. Safe and reliable  
7 service for customers cannot be sustained over the long term if the interests of  
8 shareholders and bondholders are minimized such that the public interest is not  
9 optimized.

10 Q. HOW DOES THE COMPANY'S ACTUAL COMMON EQUITY RATIO OF  
11 49.37% COMPARE WITH THE COMMON EQUITY RATIOS MAINTAINED BY  
12 THE UTILITY PROXY GROUP?

13 A. The Company's requested ratemaking common equity ratio of 49.37% for SWEPCO  
14 is reasonable and consistent with the range of common equity ratios maintained by  
15 the Utility Proxy Group. As shown on pages 3 and 4 of Schedule DWD-2, common  
16 equity ratios of the utilities range from 35.73% to 58.04% for fiscal year 2019.

17 I also considered *Value Line* projected capital structures for the utilities for  
18 2023-2025. As shown in Table 4 below, that analysis shows a range of projected  
19 common equity ratios between 37.50% and 59.00%.

**Table 4: *Value Line* Projected Equity Ratios of the Utility Proxy Group<sup>26</sup>**

<b>Company Name</b>	<b>Common Equity Ratio</b>
ALLETE, Inc.	59.00%
Alliant Energy Corporation	48.00%
Ameren Corporation	50.00%
Duke Energy Corporation	45.00%
Edison International	37.50%
Entergy Corporation	41.00%
IDACORP, Inc.	53.50%
NorthWestern Corporation	50.00%
OGE Energy Corporation	51.50%
Otter Tail Corporation	53.00%
Pinnacle West Capital Corporation	46.50%
PNM Resources, Inc.	49.00%
Portland General Electric Co.	47.50%
Xcel Energy, Inc.	42.50%

In addition to comparing the Company's actual common equity ratio with common equity ratios currently and expected to be maintained by the Utility Proxy Group, I also compared the Company's actual common equity ratio with the equity ratios maintained by the operating subsidiaries of the Utility Proxy Group companies. As shown on page 5 of Schedule DWD-2, common equity ratios of the operating utility subsidiaries of the Utility Proxy Group range from 45.23% to 65.22% for fiscal year 2019.

<sup>26</sup> See, pages 2 through 17 of Schedule DWD-3.



1 Q. IS SWEPCO'S ACTUAL EQUITY RATIO OF 49.37% APPROPRIATE FOR  
2 RATEMAKING PURPOSES GIVEN THE RANGE OF THE UTILITY PROXY  
3 GROUP?

4 A. Yes, it is. The Company's actual equity ratio of 49.37% is appropriate for  
5 ratemaking purposes in the current proceeding because it is within the range of the  
6 common equity ratios currently maintained and expected to be maintained, by the  
7 Utility Proxy Group and their operating subsidiaries.

8 **VII. COMMON EQUITY COST RATE MODELS**

9 **A. Discounted Cash Flow Model**

10 Q. WHAT IS THE THEORETICAL BASIS OF THE DCF MODEL?

11 A. The theory underlying the DCF model is that the present value of an expected future  
12 stream of net cash flows during the investment holding period can be determined by  
13 discounting those cash flows at the cost of capital, or the investors' capitalization  
14 rate. DCF theory indicates that an investor buys a stock for an expected total return  
15 rate, which is derived from the cash flows received from dividends and market price  
16 appreciation. Mathematically, the dividend yield on market price plus a growth rate  
17 equals the capitalization rate; *i.e.*, the total common equity return rate expected by  
18 investors.

19 Q. WHICH VERSION OF THE DCF MODEL DID YOU USE?

20 A. I used the single-stage constant growth DCF model in my analyses.

1 Q. PLEASE DESCRIBE THE DIVIDEND YIELD YOU USED IN APPLYING THE  
2 CONSTANT GROWTH DCF MODEL.

3 A. The unadjusted dividend yields are based on the proxy companies' dividends as of  
4 July 31, 2020, divided by the average closing market price for the 60 trading days  
5 ended July 31, 2020.<sup>27</sup>

6 Q. PLEASE EXPLAIN YOUR ADJUSTMENT TO THE DIVIDEND YIELD.

7 A. Because dividends are paid periodically (*e.g.* quarterly), as opposed to continuously  
8 (daily), an adjustment must be made to the dividend yield. This is often referred to  
9 as the discrete, or the Gordon Periodic, version of the DCF model.

10 DCF theory calls for using the full growth rate, or  $D_1$ , in calculating the  
11 model's dividend yield component. Since the companies in the Utility Proxy Group  
12 increase their quarterly dividends at various times during the year, a reasonable  
13 assumption is to reflect one-half the annual dividend growth rate in the dividend  
14 yield component, or  $D_{1/2}$ . Because the dividend should be representative of the next  
15 12-month period, this adjustment is a conservative approach that does not overstate  
16 the dividend yield. Therefore, the actual average dividend yields in Column 1, page  
17 1 of Schedule DWD-3 have been adjusted upward to reflect one-half the average  
18 projected growth rate shown in Column 6.

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27 See, Column 1, page 1 of Schedule DWD-3.

1 Q. PLEASE EXPLAIN THE BASIS FOR THE GROWTH RATES YOU APPLY TO  
2 THE UTILITY PROXY GROUP IN YOUR CONSTANT GROWTH DCF MODEL.

3 A. Investors with more limited resources than institutional investors are likely to rely on  
4 widely available financial information services, such as *Value Line*, Zacks, and  
5 Yahoo! Finance. Investors realize that analysts have significant insight into the  
6 dynamics of the industries and individual companies they analyze, as well as  
7 companies' abilities to effectively manage the effects of changing laws and  
8 regulations, and ever-changing economic and market conditions. For these reasons, I  
9 used analysts' five-year forecasts of EPS growth in my DCF analysis.

10 Over the long run, there can be no growth in DPS without growth in EPS.  
11 Security analysts' earnings expectations have a more significant influence on market  
12 prices than dividend expectations. Thus, using projected earnings growth rates in a  
13 DCF analysis provides a better match between investors' market price appreciation  
14 expectations and the growth rate component of the DCF.

15 Q. PLEASE SUMMARIZE THE CONSTANT GROWTH DCF MODEL RESULTS.

16 A. As shown on page 1 of Schedule DWD-3, for the Utility Proxy Group, the mean  
17 result of applying the single-stage DCF model is 8.63%, the median result is 8.82%,  
18 and the average of the two is 8.73%. In arriving at a conclusion for the constant  
19 growth DCF-indicated common equity cost rate for the Utility Proxy Group, I relied  
20 on an average of the mean and the median results of the DCF.

1           **B.      The Risk Premium Model**

2    Q.    PLEASE DESCRIBE THE THEORETICAL BASIS OF THE RPM.

3    A.    The RPM is based on the fundamental financial principle of risk and return; namely,  
4           that investors require greater returns for bearing greater risk. The RPM recognizes  
5           that common equity capital has greater investment risk than debt capital, as common  
6           equity shareholders are behind debt holders in any claim on a company's assets and  
7           earnings. As a result, investors require higher returns from common stocks than  
8           from bonds to compensate them for bearing the additional risk.

9           While it is possible to directly observe bond returns and yields, investors'  
10          required common equity returns cannot be directly determined or observed.  
11          According to RPM theory, one can estimate a common equity risk premium over  
12          bonds (either historically or prospectively), and use that premium to derive a cost rate  
13          of common equity. The cost of common equity equals the expected cost rate for  
14          long-term debt capital, plus a risk premium over that cost rate, to compensate  
15          common shareholders for the added risk of being unsecured and last-in-line for any  
16          claim on the corporation's assets and earnings upon liquidation.

17   Q.   PLEASE EXPLAIN HOW YOU DERIVED YOUR INDICATED COST OF  
18          COMMON EQUITY BASED ON THE RPM.

19   A.   To derive my indicated cost of common equity under the RPM, I used two risk  
20          premium methods. The first method was the Predictive Risk Premium Model  
21          ("PRPM") and the second method was a risk premium model using a total market  
22          approach. The PRPM estimates the risk-return relationship directly, while the total

1 market approach indirectly derives a risk premium by using known metrics as a  
2 proxy for risk.

3 Q. PLEASE EXPLAIN THE PRPM.

4 A. The PRPM, published in the *Journal of Regulatory Economics*,<sup>28</sup> was developed  
5 from the work of Robert F. Engle, who shared the Nobel Prize in Economics in 2003  
6 “for methods of analyzing economic time series with time-varying volatility” or  
7 ARCH.<sup>29</sup> Engle found that volatility changes over time and is related from one  
8 period to the next, especially in financial markets. Engle discovered that volatility of  
9 prices and returns clusters over time and is therefore highly predictable and can be  
10 used to predict future levels of risk and risk premiums.

11 The PRPM estimates the risk-return relationship directly, as the predicted  
12 equity risk premium is generated by predicting volatility or risk. The PRPM is not  
13 based on an estimate of investor behavior, but rather on an evaluation of the results  
14 of that behavior (*i.e.*, the variance of historical equity risk premiums).

15 The inputs to the model are the historical returns on the common shares of  
16 each Utility Proxy Group company minus the historical monthly yield on long-term  
17 U.S. Treasury securities through July 2020. Using a generalized form of ARCH,  
18 known as GARCH, I calculated each Utility Proxy Group company’s projected  
19 equity risk premium using Eviews<sup>®</sup> statistical software. When the GARCH model is  
20 applied to the historical return data, it produces a predicted GARCH variance series<sup>30</sup>

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28 Pauline M. Ahern, Frank J. Hanley and Richard A. Michelfelder, Ph.D. *A New Approach for Estimating the Equity Risk Premium for Public Utilities*, The Journal of Regulatory Economics (December 2011), 40:261-278.

29 Autoregressive conditional heteroscedasticity; See also, [www.nobelprize.org](http://www.nobelprize.org).

30 Illustrated on Columns 1 and 2, page 2 of Schedule DWD-4.

1 and a GARCH coefficient.<sup>31</sup> Multiplying the predicted monthly variance by the  
2 GARCH coefficient and then annualizing it<sup>32</sup> produces the predicted annual equity  
3 risk premium. I then added the forecasted 30-year U.S. Treasury bond yield of  
4 2.09%<sup>33</sup> to each company's PRPM-derived equity risk premium to arrive at an  
5 indicated cost of common equity. The 30-year U.S. Treasury bond yield is a  
6 consensus forecast derived from *Blue Chip*.<sup>34</sup> The mean PRPM indicated common  
7 equity cost rate for the Utility Proxy Group is 10.33%, the median is 10.21%, and the  
8 average of the two is 10.27%. Consistent with my reliance on the average of the  
9 median and mean results of the DCF models, I relied on the average of the mean and  
10 median results of the Utility Proxy Group PRPM to calculate a cost of common  
11 equity rate of 10.27%.

12 Q. PLEASE EXPLAIN THE TOTAL MARKET APPROACH RPM.

13 A. The total market approach RPM adds a prospective public utility bond yield to an  
14 average of: 1) an equity risk premium that is derived from a Beta-adjusted total  
15 market equity risk premium, 2) an equity risk premium based on the S&P Utilities  
16 Index, and 3) an equity risk premium based on authorized ROEs for electric utilities.

17 Q. PLEASE EXPLAIN THE BASIS OF THE EXPECTED BOND YIELD OF 3.78%  
18 APPLICABLE TO THE UTILITY PROXY GROUP.

19 A. The first step in the total market approach RPM analysis is to determine the expected  
20 bond yield. Because both ratemaking and the cost of capital, including the common

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31 Illustrated on Column 4, page 2 of Schedule DWD-4.

32 Annualized Return =  $(1 + \text{Monthly Return})^{12} - 1$

33 See, Column 6, page 2 of Schedule DWD-4.

34 See, Blue Chip Financial Forecasts, June 1, 2020 at page 14 and July 31, 2020 at page 2.

1 equity cost rate, are prospective in nature, a prospective yield on similarly-rated long-  
2 term debt is essential. I relied on a consensus forecast of about 50 economists of the  
3 expected yield on Aaa-rated corporate bonds for the six calendar quarters ending  
4 with the fourth calendar quarter of 2021, and *Blue Chip's* long-term projections for  
5 2022 to 2026, and 2027 to 2031. As shown on line 1, page 3 of Schedule DWD-4,  
6 the average expected yield on Moody's Aaa-rated corporate bonds is 3.03%. In  
7 order to adjust the expected Aaa-rated corporate bond yield to an equivalent A2-rated  
8 public utility bond yield, I made an upward adjustment of 0.61%, which represents a  
9 recent spread between Aaa-rated corporate bonds and A2-rated public utility bonds.<sup>35</sup>  
10 Adding that recent 0.61% spread to the expected Aaa-rated corporate bond yield of  
11 3.03% results in an expected A2-rated public utility bond yield of 3.64%. Since the  
12 Utility Proxy Group's average Moody's long-term issuer rating is A3, another  
13 adjustment to the expected A2-rated public utility bond is needed to reflect the  
14 difference in bond ratings. An upward adjustment of 0.14%, which represents one-  
15 third of a recent spread between A2-rated and Baa2-rated public utility bond yields,  
16 is necessary to make the A2 prospective bond yield applicable to an A3-rated public  
17 utility bond.<sup>36</sup> Adding the 0.14% to the 3.64% prospective A2-rated public utility  
18 bond yield results in a 3.78% expected bond yield applicable to the Utility Proxy  
19 Group.

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35 As shown on line 2 and explained in note 2, page 3 of Schedule DWD-4.

36 As shown on line 4 and explained in note 3, page 3 of Schedule DWD-4.

**Table 5: Summary of the Calculation of the Utility Proxy Group Projected Bond Yield<sup>37</sup>**

Prospective Yield on Moody's Aaa-Rated Corporate Bonds ( <i>Blue Chip</i> )	3.03%
Adjustment to Reflect Yield Spread Between Moody's Aaa-Rated Corporate Bonds and Moody's A2-Rated Utility Bonds	0.61%
Adjustment to Reflect the Utility Proxy Group's Average Moody's Bond Rating of A3	<u>0.14%</u>
Prospective Bond Yield Applicable to the Utility Proxy Group	<u>3.78%</u>

Q. PLEASE EXPLAIN HOW THE BETA-DERIVED EQUITY RISK PREMIUM IS DETERMINED.

A. The components of the Beta-derived risk premium model are: 1) an expected market equity risk premium over corporate bonds, and 2) the Beta coefficient. The derivation of the Beta-derived equity risk premium that I applied to the Utility Proxy Group is shown on lines 1 through 9, on page 8 of Schedule DWD-4. The total Beta-derived equity risk premium I applied is based on an average of three historical market data-based equity risk premiums, two *Value Line*-based equity risk premiums, and a Bloomberg-based equity risk premium. Each of these is described below.

Q. HOW DID YOU DERIVE A MARKET EQUITY RISK PREMIUM BASED ON LONG-TERM HISTORICAL DATA?

A. To derive an historical market equity risk premium, I used the most recent holding period returns for the large company common stocks from the Stocks, Bonds, Bills, and Inflation ("SBBI") Yearbook 2020 ("SBBI - 2020")<sup>38</sup> less the average historical

<sup>37</sup> As shown on page 3 of Schedule DWD-4.

<sup>38</sup> See, SBBI-2020 Appendix A Tables: Morningstar Stocks, Bonds, Bills, & Inflation 1926-2019.



1 yield on Moody's Aaa/Aa-rated corporate bonds for the period 1928 to 2019. Using  
2 holding period returns over a very long time is appropriate because it is consistent  
3 with the long-term investment horizon presumed by investing in a going concern,  
4 *i.e.*, a company expected to operate in perpetuity.

5 SBBI's long-term arithmetic mean monthly total return rate on large company  
6 common stocks was 11.83% and the long-term arithmetic mean monthly yield on  
7 Moody's Aaa/Aa-rated corporate bonds was 6.05%.<sup>39</sup> As shown on line 1, page 8 of  
8 Schedule DWD-4, subtracting the mean monthly bond yield from the total return on  
9 large company stocks results in a long-term historical equity risk premium of 5.78%.

10 I used the arithmetic mean monthly total return rates for the large company  
11 stocks and yields (income returns) for the Moody's Aaa/Aa corporate bonds, because  
12 they are appropriate for the purpose of estimating the cost of capital as noted in SBBI  
13 - 2020.<sup>40</sup> Using the arithmetic mean return rates and yields is appropriate because  
14 historical total returns and equity risk premiums provide insight into the variance and  
15 standard deviation of returns needed by investors in estimating future risk when  
16 making a current investment. If investors relied on the geometric mean of historical  
17 equity risk premiums, they would have no insight into the potential variance of future  
18 returns, because the geometric mean relates the change over many periods to a  
19 constant rate of change, thereby obviating the year-to-year fluctuations, or variance,  
20 which is critical to risk analysis.

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39 As explained in note 1, page 9 of Schedule DWD-4.

40 See, SBBI - 2020, at page 10-22.

1 Q. PLEASE EXPLAIN THE DERIVATION OF THE REGRESSION-BASED  
2 MARKET EQUITY RISK PREMIUM.

3 A. To derive the regression-based market equity risk premium of 9.34% shown on line  
4 2, page 8 of Schedule DWD-4, I used the same monthly annualized total returns on  
5 large company common stocks relative to the monthly annualized yields on Moody's  
6 Aaa/Aa-rated corporate bonds as mentioned above. I modeled the relationship  
7 between interest rates and the market equity risk premium using the observed  
8 monthly market equity risk premium as the dependent variable, and the monthly  
9 yield on Moody's Aaa/Aa-rated corporate bonds as the independent variable. I then  
10 used a linear Ordinary Least Squares ("OLS") regression, in which the market equity  
11 risk premium is expressed as a function of the Moody's Aaa/Aa-rated corporate  
12 bonds yield:

13 
$$RP = \alpha + \beta (R_{Aaa/Aa})$$

14 Q. PLEASE EXPLAIN THE DERIVATION OF THE PRPM EQUITY RISK  
15 PREMIUM.

16 A. I used the same PRPM approach described above to the PRPM equity risk premium.  
17 The inputs to the model are the historical monthly returns on large company common  
18 stocks minus the monthly yields on Moody's Aaa/Aa-rated corporate bonds during  
19 the period from January 1928 through July 2020.<sup>41</sup> Using the previously discussed  
20 generalized form of ARCH, known as GARCH, the projected equity risk premium is

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41 Data from January 1926 to December 2019 is from SBBI - 2020. Data from January 2020 to July 2020 is from Bloomberg.

1 determined using Eviews<sup>®</sup> statistical software. The resulting PRPM predicted a  
2 market equity risk premium of 9.55%.<sup>42</sup>

3 Q. PLEASE EXPLAIN THE DERIVATION OF A PROJECTED EQUITY RISK  
4 PREMIUM BASED ON VALUE LINE DATA FOR YOUR RPM ANALYSIS.

5 A. As noted above, because both ratemaking and the cost of capital are prospective, a  
6 prospective market equity risk premium is needed. The derivation of the forecasted  
7 or prospective market equity risk premium can be found in note 4, page 8 of  
8 Schedule DWD-4. Consistent with my calculation of the dividend yield component  
9 in my DCF analysis, this prospective market equity risk premium is derived from an  
10 average of the three- to five-year median market price appreciation potential by  
11 *Value Line* for the 13 weeks ended July 31, 2020, plus an average of the median  
12 estimated dividend yield for the common stocks of the 1,700 firms covered in *Value*  
13 *Line* (Standard Edition).<sup>43</sup>

14 The average median expected price appreciation is 69%, which translates to a  
15 14.02% annual appreciation, and when added to the average of *Value Line's* median  
16 expected dividend yields of 2.51%, equates to a forecasted annual total return rate on  
17 the market of 16.53%. The forecasted Moody's Aaa-rated corporate bond yield of  
18 3.03% is deducted from the total market return of 16.53%, resulting in an equity risk  
19 premium of 13.50%, as shown on line 4, page 8 of Schedule DWD-4.

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42 Shown on line 3, page 8 of Schedule DWD-4.

43 As explained in detail in note 1, page 2 of Schedule DWD-4.

1 Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM  
2 BASED ON THE S&P 500 COMPANIES.

3 A. Using data from *Value Line*, I calculated an expected total return on the S&P 500  
4 companies using expected dividend yields and long-term growth estimates as a proxy  
5 for capital appreciation. The expected total return for the S&P 500 is 13.66%.  
6 Subtracting the prospective yield on Moody's Aaa-rated corporate bonds of 3.03%  
7 results in a 10.63% projected equity risk premium.

8 Q. PLEASE EXPLAIN THE DERIVATION OF AN EQUITY RISK PREMIUM  
9 BASED ON BLOOMBERG DATA.

10 A. Using data from Bloomberg, I calculated an expected total return on the S&P 500  
11 using expected dividend yields and long-term growth estimates as a proxy for capital  
12 appreciation, identical to the method described above. The expected total return for  
13 the S&P 500 is 13.75%. Subtracting the prospective yield on Moody's Aaa-rated  
14 corporate bonds of 3.03% results in a 10.72% projected equity risk premium.

15 Q. WHAT IS YOUR CONCLUSION OF A BETA-DERIVED EQUITY RISK  
16 PREMIUM FOR USE IN YOUR RPM ANALYSIS?

17 A. I gave equal weight to all six equity risk premiums based on each source – historical,  
18 *Value Line*, and Bloomberg – in arriving at a 9.92% equity risk premium.

**Table 6: Summary of the Calculation of the Equity Risk Premium using Total Market Returns<sup>44</sup>**

Historical Spread Between Total Returns of Large Stocks and Aaa and Aa-Rated Corporate Bond Yields (1928 – 2019)	5.78%
Regression Analysis on Historical Data	9.34%
PRPM Analysis on Historical Data	9.55%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected Aaa Corporate Bond Yields	13.50%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected Aaa Corporate Bond Yields	10.63%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected Aaa Corporate Bond Yields	<u>10.72%</u>
<b>Average</b>	<u><b>9.92%</b></u>

After calculating the average market equity risk premium of 9.92%, I adjusted it by the Beta coefficient to account for the risk of the Utility Proxy Group. As discussed below, the Beta coefficient is a meaningful measure of prospective relative risk to the market as a whole, and is a logical way to allocate a company's, or proxy group's, share of the market's total equity risk premium relative to corporate bond yields. As shown on page 1 of Schedule DWD-5, the average of the mean and median Beta coefficient for the Utility Proxy Group is 0.95. Multiplying the 0.95 average Beta coefficient by the market equity risk premium of 9.92% results in a Beta-adjusted equity risk premium for the Utility Proxy Group of 9.42%.

<sup>44</sup> As shown on page 8 of Schedule DWD-4.

1 Q. HOW DID YOU DERIVE THE EQUITY RISK PREMIUM BASED ON THE S&P  
2 UTILITY INDEX AND MOODY'S A-RATED PUBLIC UTILITY BONDS?

3 A. I estimated three equity risk premiums based on S&P Utility Index holding period  
4 returns, and two equity risk premiums based on the expected returns of the S&P  
5 Utilities Index, using *Value Line* and Bloomberg data, respectively. Turning first to  
6 the S&P Utility Index holding period returns, I derived a long-term monthly  
7 arithmetic mean equity risk premium between the S&P Utility Index total returns of  
8 10.74% and monthly Moody's A-rated public utility bond yields of 6.53% from 1928  
9 to 2019 to arrive at an equity risk premium of 4.21%.<sup>45</sup> I then used the same  
10 historical data to derive an equity risk premium of 6.76% based on a regression of the  
11 monthly equity risk premiums. The final S&P Utility Index holding period equity  
12 risk premium involved applying the PRPM using the historical monthly equity risk  
13 premiums from January 1928 to July 2020 to arrive at a PRPM-derived equity risk  
14 premium of 5.57% for the S&P Utility Index.

15 I then derived expected total returns on the S&P Utilities Index of 10.57%  
16 and 9.04% using data from *Value Line* and Bloomberg, respectively, and subtracted  
17 the prospective Moody's A2-rated public utility bond yield of 3.64%<sup>46</sup>, which  
18 resulted in equity risk premiums of 6.93% and 5.40%, respectively. As with the  
19 market equity risk premiums, I averaged each risk premium based on each source  
20 (*i.e.*, historical, *Value Line*, and Bloomberg) to arrive at my utility-specific equity  
21 risk premium of 5.77%.

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45 As shown on line 1, page 12 of Schedule DWD-4.

46 Derived on line 3, page 3 of Schedule DWD-4.

**Table 7: Summary of the Calculation of the Equity Risk Premium using S&P Utility Index Holding Returns<sup>47</sup>**

Historical Spread Between Total Returns of the S&P Utilities Index and A2-Rated Utility Bond Yields (1928 – 2019)	4.21%
Regression Analysis on Historical Data	6.76%
PRPM Analysis on Historical Data	5.57%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P Utilities Index less Projected A2 Utility Bond Yields	6.93%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P Utilities Index less Projected A2 Utility Bond Yields	<u>5.40%</u>
<b>Average</b>	<u>5.77%</u>

Q. HOW DO YOU DERIVE AN EQUITY RISK PREMIUM OF 5.88% BASED ON AUTHORIZED ROES FOR ELECTRIC UTILITIES?

A. The equity risk premium of 5.88% shown on line 3, page 7 of Schedule DWD-4 is the result of a regression analysis based on regulatory awarded ROEs related to the yields on Moody's A2-rated public utility bonds. That analysis is shown on page 13 of Schedule DWD-4. Page 13 of Schedule DWD-4 contains the graphical results of a regression analysis of 1,167 rate cases for electric utilities which were fully litigated during the period from January 1, 1980 through July 31, 2019. It shows the implicit equity risk premium relative to the yields on A2-rated public utility bonds immediately prior to the issuance of each regulatory decision. It is readily discernible that there is an inverse relationship between the yield on A2-rated public utility bonds and equity risk premiums. In other words, as interest rates decline, the equity risk premium rises and vice versa, a result consistent with financial literature

<sup>47</sup> As shown on page 12 of Schedule DWD-4.

1 on the subject.<sup>48</sup> I used the regression results to estimate the equity risk premium  
2 applicable to the projected yield on Moody's A2-rated public utility bonds. Given  
3 the expected A2-rated utility bond yield of 3.64%, it can be calculated that the  
4 indicated equity risk premium applicable to that bond yield is 5.88%, which is shown  
5 on line 3, page 7 of Schedule DWD-4.

6 Q. WHAT IS YOUR CONCLUSION OF AN EQUITY RISK PREMIUM FOR USE IN  
7 YOUR TOTAL MARKET APPROACH RPM ANALYSIS?

8 A. The equity risk premium I apply to the Utility Proxy Group is 7.02%, which is the  
9 average of the Beta-adjusted equity risk premium for the Utility Proxy Group, the  
10 S&P Utilities Index, and the authorized return utility equity risk premiums of  
11 9.42%, 5.77%, and 5.88%, respectively.<sup>49</sup>

12 Q. WHAT IS THE INDICATED RPM COMMON EQUITY COST RATE BASED ON  
13 THE TOTAL MARKET APPROACH?

14 A. As shown on line 7, page 3 of Schedule DWD-4 and shown on Table 8, below, I  
15 calculated a common equity cost rate of 10.80% for the Utility Proxy Group based on  
16 the total market approach RPM.

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48 See, e.g., Robert S. Harris and Felicia C. Marston, *The Market Risk Premium: Expectational Estimates Using Analysts' Forecasts*, Journal of Applied Finance, Vol. 11, No. 1, 2001, at 11-12; Eugene F. Brigham, Dilip K. Shome, and Steve R. Vinson, *The Risk Premium Approach to Measuring a Utility's Cost of Equity*, Financial Management, Spring 1985, at 33-45.

49 As shown on page 7 of Schedule DWD-4.



1                   **Table 8: Summary of the Total Market Return Risk Premium Model<sup>50</sup>**

Prospective Moody's A3-Rated Utility Bond Applicable to the Utility Proxy Group	3.78%
Prospective Equity Risk Premium	7.02%
Indicated Cost of Common Equity	10.80%

2       Q.       WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE PRPM AND  
3               THE TOTAL MARKET APPROACH RPM?

4       A.       As shown on page 1 of Schedule DWD-4, the indicated RPM-derived common  
5               equity cost rate is 10.54%, which gives equal weight to the PRPM (10.27%) and the  
6               adjusted-market approach results (10.80%).

7               **C.       The Capital Asset Pricing Model**

8       Q.       PLEASE EXPLAIN THE THEORETICAL BASIS OF THE CAPM.

9       A.       CAPM theory defines risk as the co-variability of a security's returns with the  
10              market's returns as measured by the Beta coefficient ( $\beta$ ). A Beta coefficient less than  
11              1.0 indicates lower variability than the market as a whole, while a Beta coefficient  
12              greater than 1.0 indicates greater variability than the market.

13              The CAPM assumes that all non-market or unsystematic risk can be  
14              eliminated through diversification. The risk that cannot be eliminated through  
15              diversification is called market, or systematic, risk. In addition, the CAPM presumes  
16              that investors only require compensation for systematic risk, which is the result of  
17              macroeconomic and other events that affect the returns on all assets. The model is  
18              applied by adding a risk-free rate of return to a market risk premium, which is  
19              adjusted proportionately to reflect the systematic risk of the individual security

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50       As shown on page 3 of Schedule DWD-4.

1 relative to the total market as measured by the Beta coefficient. The traditional  
2 CAPM model is expressed as:

3 
$$R_s = R_f + \beta (R_m - R_f)$$

4 Where:  $R_s$  = Return rate on the common stock;

5  $R_f$  = Risk-free rate of return;

6  $R_m$  = Return rate on the market as a whole; and

7  $\beta$  = Adjusted Beta coefficient (volatility of the  
8 security relative to the market as a whole)

9 Numerous tests of the CAPM have measured the extent to which security  
10 returns and Beta coefficients are related as predicted by the CAPM, confirming its  
11 validity. The empirical CAPM (“ECAPM”) reflects the reality that while the results  
12 of these tests support the notion that the Beta coefficient is related to security returns,  
13 the empirical Security Market Line (“SML”) described by the CAPM formula is not  
14 as steeply sloped as the predicted SML.<sup>51</sup>

15 The ECAPM reflects this empirical reality. Fama and French clearly state  
16 regarding Figure 2, below, that “[t]he returns on the low beta portfolios are too high,  
17 and the returns on the high beta portfolios are too low.”<sup>52</sup>

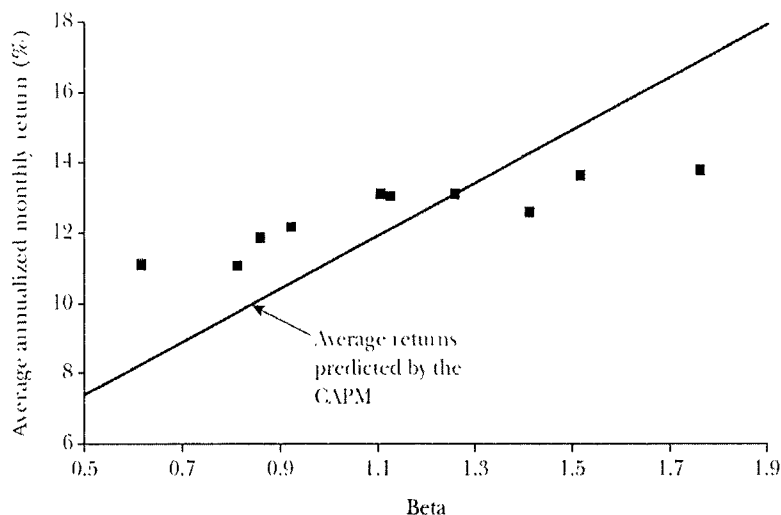
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51 Roger A. Morin, *New Regulatory Finance*, at page 175 (“Morin”).

52 Eugene F. Fama and Kenneth R. French, *The Capital Asset Pricing Model: Theory and Evidence*, *Journal of Economic Perspectives*, Vol. 18, No. 3, Summer 2004 at 33 (“Fama & French”).

Figure 2 <http://pubs.aeaweb.org/doi/pdfplus/10.1257/0895330042162430>

Average Annualized Monthly Return versus Beta for Value Weight Portfolios Formed on Prior Beta, 1928–2003



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In addition, Morin observes that while the results of these tests support the notion that Beta is related to security returns, the empirical SML described by the CAPM formula is not as steeply sloped as the predicted SML. Morin states:

With few exceptions, the empirical studies agree that ... low-beta securities earn returns somewhat higher than the CAPM would predict, and high-beta securities earn less than predicted.<sup>53</sup>

\* \* \*

Therefore, the empirical evidence suggests that the expected return on a security is related to its risk by the following approximation:

$$K = R_F + x (R_M - R_F) + (1-x) \beta (R_M - R_F)$$

where x is a fraction to be determined empirically. The value of x that best explains the observed relationship [is]  $\text{Return} = 0.0829 + 0.0520 \beta$  is between 0.25 and 0.30. If  $x = 0.25$ , the equation becomes:

53 Morin, at 175.

1 
$$K = R_F + 0.25(R_M - R_F) + 0.75 \beta(R_M - R_F)^{54}$$

2 Fama and French provide similar support for the ECAPM when they state:

3 The early tests firmly reject the Sharpe-Lintner version of the  
4 CAPM. There is a positive relation between beta and average  
5 return, but it is too 'flat.'... The regressions consistently find that  
6 the intercept is greater than the average risk-free rate... and the  
7 coefficient on beta is less than the average excess market return...  
8 This is true in the early tests... as well as in more recent cross-  
9 section regressions tests, like Fama and French (1992).<sup>55</sup>

10 Finally, Fama and French further note:

11 Confirming earlier evidence, the relation between beta and average  
12 return for the ten portfolios is much flatter than the Sharpe-Linter  
13 CAPM predicts. The returns on low beta portfolios are too high,  
14 and the returns on the high beta portfolios are too low. For  
15 example, the predicted return on the portfolio with the lowest beta  
16 is 8.3 percent per year; the actual return as 11.1 percent. The  
17 predicted return on the portfolio with the t beta is 16.8 percent per  
18 year; the actual is 13.7 percent.<sup>56</sup>

19 Clearly, the justification from Morin, Fama, and French, along with their  
20 reviews of other academic research on the CAPM, validate the use of the ECAPM.  
21 In view of theory and practical research, I have applied both the traditional CAPM  
22 and the ECAPM to the companies in the Utility Proxy Group and averaged the  
23 results.

24 Q. WHAT BETA COEFFICIENTS DID YOU USE IN YOUR CAPM ANALYSIS?

25 A. For the Beta coefficients in my CAPM analysis, I considered two sources: *Value Line*  
26 and Bloomberg Professional Services. While both of those services adjust their  
27 calculated (or "raw") Beta coefficients to reflect the tendency of the Beta coefficient

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54 Morin, at 190.

55 Fama & French, at 32.

56 *Ibid.*, at 33.

1 to regress to the market mean of 1.00, *Value Line* calculates the Beta coefficient over  
2 a five-year period, while Bloomberg calculates it over a two-year period.

3 Q. PLEASE DESCRIBE YOUR SELECTION OF A RISK-FREE RATE OF RETURN.

4 A. As shown in Column 5, page 1 of Schedule DWD-5, the risk-free rate adopted for  
5 both applications of the CAPM is 2.09%. This risk-free rate is based on the average  
6 of the *Blue Chip* consensus forecast of the expected yields on 30-year U.S. Treasury  
7 bonds for the six quarters ending with the fourth calendar quarter of 2021, and long-  
8 term projections for the years 2022 to 2026 and 2027 to 2031.

9 Q. WHY IS THE YIELD ON LONG-TERM U.S. TREASURY BONDS  
10 APPROPRIATE FOR USE AS THE RISK-FREE RATE?

11 A. The yield on long-term U.S. Treasury bonds is almost risk-free and its term is  
12 consistent with the long-term cost of capital to public utilities measured by the yields  
13 on Moody's A-rated public utility bonds; the long-term investment horizon inherent  
14 in utilities' common stocks; and the long-term life of the jurisdictional rate base to  
15 which the allowed fair rate of return (*i.e.*, cost of capital) will be applied. In contrast,  
16 short-term U.S. Treasury yields are more volatile and largely a function of Federal  
17 Reserve monetary policy.

18 Q. PLEASE EXPLAIN THE ESTIMATION OF THE EXPECTED RISK PREMIUM  
19 FOR THE MARKET USED IN YOUR CAPM ANALYSES.

20 A. The basis of the market risk premium is explained in detail in note 1 on Schedule  
21 DWD-5. As discussed above, the market risk premium is derived from an average of

1 three historical data-based market risk premiums, two *Value Line* data-based market  
2 risk premiums, and one Bloomberg data-based market risk premium.

3 The long-term income return on U.S. Government securities of 5.09% was  
4 deducted from the SBBI - 2020 monthly historical total market return of 12.10%,  
5 which results in an historical market equity risk premium of 7.01%.<sup>57</sup> I applied a  
6 linear OLS regression to the monthly annualized historical returns on the S&P 500  
7 relative to historical yields on long-term U.S. Government securities from SBBI -  
8 2020. That regression analysis yielded a market equity risk premium of 10.20%.  
9 The PRPM market equity risk premium is 10.67%, and is derived using the PRPM  
10 relative to the yields on long-term U.S. Treasury securities from January 1926  
11 through July 2020.

12 The *Value Line*-derived forecasted total market equity risk premium is  
13 derived by deducting the forecasted risk-free rate of 2.09%, discussed above, from  
14 the *Value Line* projected total annual market return of 16.53%, resulting in a  
15 forecasted total market equity risk premium of 14.44%. The S&P 500 projected  
16 market equity risk premium using *Value Line* data is derived by subtracting the  
17 projected risk-free rate of 2.09% from the projected total return of the S&P 500 of  
18 13.66%. The resulting market equity risk premium is 11.57%.

19 The S&P 500 projected market equity risk premium using Bloomberg data is  
20 derived by subtracting the projected risk-free rate of 2.09% from the projected total  
21 return of the S&P 500 of 13.75%. The resulting market equity risk premium is  
22 11.66%. These six measures, when averaged, result in an average total market equity

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57 SBBI - 2020, at Appendix A-1 (1) through A-1 (3) and Appendix A-7 (19) through A-7 (21).

1 risk premium of 10.92%.

2 **Table 9: Summary of the Calculation of the Market Risk Premium**  
3 **for use in the CAPM<sup>58</sup>**

Historical Spread Between Total Returns of Large Stocks and Long-Term Government Bond Yields (1926 – 2019)	7.01%
Regression Analysis on Historical Data	10.20%
PRPM Analysis on Historical Data	10.67%
Prospective Equity Risk Premium using Total Market Returns from <i>Value Line</i> Summary & Index less Projected 30-Year Treasury Bond Yields	14.44%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from <i>Value Line</i> for the S&P 500 less Projected 30-Year Treasury Bond Yields	11.57%
Prospective Equity Risk Premium using Measures of Capital Appreciation and Income Returns from Bloomberg Professional Services for the S&P 500 less Projected 30-Year Treasury Bond Yields	<u>11.66%</u>
<b>Average</b>	<u>10.92%</u>

4 Q. WHAT ARE THE RESULTS OF YOUR APPLICATION OF THE TRADITIONAL  
5 AND EMPIRICAL CAPM TO THE UTILITY PROXY GROUP?

6 A. As shown on page 1 of Schedule DWD-5, the mean result of my CAPM/ECAPM  
7 analyses is 12.61%, the median is 12.30%, and the average of the two is 12.46%.  
8 Consistent with my reliance on the average of mean and median DCF results  
9 discussed above, the indicated common equity cost rate using the CAPM/ECAPM is  
10 12.46%.

---

58 As shown on page 2 of Schedule DWD-5.

1           **D.      Common Equity Cost Rates for a Proxy Group of Domestic, Non-**  
2           **Price Regulated Companies Based on the DCF, RPM, and CAPM**

3    Q.     WHY DO YOU ALSO CONSIDER A PROXY GROUP OF DOMESTIC, NON-  
4           PRICE REGULATED COMPANIES?

5    A.     In the *Hope* and *Bluefield* cases, the U.S. Supreme Court did not specify that  
6           comparable risk companies had to be utilities. Since the purpose of rate regulation is  
7           to be a substitute for marketplace competition, non-price regulated firms operating in  
8           the competitive marketplace make an excellent proxy if they are comparable in total  
9           risk to the Utility Proxy Group being used to estimate the cost of common equity.  
10          The selection of such domestic, non-price regulated competitive firms theoretically  
11          and empirically results in a proxy group which is comparable in total risk to the  
12          Utility Proxy Group, since all of these companies compete for capital in the exact  
13          same markets.

14   Q.     HOW DID YOU SELECT NON-PRICE REGULATED COMPANIES THAT ARE  
15          COMPARABLE IN TOTAL RISK TO THE UTILITY PROXY GROUP?

16   A.     In order to select a proxy group of domestic, non-price regulated companies similar  
17          in total risk to the Utility Proxy Group, I relied on the Beta coefficients and related  
18          statistics derived from *Value Line* regression analyses of weekly market prices over  
19          the most recent 260 weeks (*i.e.*, five years). These selection criteria resulted in a  
20          proxy group of 45 domestic, non-price regulated firms comparable in total risk to the  
21          Utility Proxy Group. Total risk is the sum of non-diversifiable market risk and  
22          diversifiable company-specific risks. The criteria used in selecting the domestic,  
23          non-price regulated firms was:



- 1 (i) They must be covered by *Value Line* (Standard Edition);
- 2 (ii) They must be domestic, non-price regulated companies, *i.e.*, not utilities;
- 3 (iii) Their Beta coefficients must lie within plus or minus two standard deviations
- 4 of the average unadjusted Beta coefficients of the Utility Proxy Group; and
- 5 (iv) The residual standard errors of the *Value Line* regressions which gave rise to
- 6 the unadjusted Beta coefficients must lie within plus or minus two standard
- 7 deviations of the average residual standard error of the Utility Proxy Group.

8 Beta coefficients measure market, or systematic, risk, which is not

9 diversifiable. The residual standard errors of the regressions measure each firm's

10 company-specific, diversifiable risk. Companies that have similar Beta coefficients

11 and similar residual standard errors resulting from the same regression analyses have

12 similar total investment risk.

13 Q. HAVE YOU PREPARED A SCHEDULE WHICH SHOWS THE DATA FROM

14 WHICH YOU SELECTED THE 45 DOMESTIC, NON-PRICE REGULATED

15 COMPANIES THAT ARE COMPARABLE IN TOTAL RISK TO THE UTILITY

16 PROXY GROUP?

17 A. Yes, the basis of my selection and both proxy groups' regression statistics are shown

18 in Schedule DWD-6.

19 Q. DID YOU CALCULATE COMMON EQUITY COST RATES USING THE DCF

20 MODEL, RPM, AND CAPM FOR THE NON-PRICE REGULATED PROXY

21 GROUP?

22 A. Yes. Because the DCF model, RPM, and CAPM have been applied in an identical

23 manner as described above, I will not repeat the details of the rationale and

1 application of each model. One exception is in the application of the RPM, where I  
2 did not use public utility-specific equity risk premiums, nor did I apply the PRPM to  
3 the individual non-price regulated companies.

4 Page 2 of Schedule DWD-7 derives the constant growth DCF model common  
5 equity cost rate. As shown, the indicated common equity cost rate, using the  
6 constant growth DCF for the Non-Price Regulated Proxy Group comparable in total  
7 risk to the Utility Proxy Group, is 11.50%.

8 Pages 3 through 5 of Schedule DWD-7 contain the data and calculations that  
9 support the 12.86% RPM common equity cost rate. As shown on line 1, page 3 of  
10 Schedule DWD-7, the consensus prospective yield on Moody's Baa-rated corporate  
11 bonds for the six quarters ending in the fourth quarter of 2021, and for the years 2022  
12 to 2026 and 2027 to 2031, is 4.18%.<sup>59</sup> Since the Non-Price Regulated Proxy Group  
13 has an average Moody's long-term issuer rating of A3/Baa1, a downward adjustment  
14 of 0.35% to the projected Baa2-rated corporate bond yield is necessary to reflect the  
15 difference in ratings which results in a projected A3/Baa1-rated corporate bond yield  
16 of 3.83%.

17 When the Beta-adjusted risk premium of 9.03%<sup>60</sup> relative to the Non-Price  
18 Regulated Proxy Group is added to the prospective A3/Baa1-rated corporate bond  
19 yield of 3.83%, the indicated RPM common equity cost rate is 12.86%.

20 Page 6 of Schedule DWD-7 contains the inputs and calculations that support  
21 my indicated CAPM/ECAPM common equity cost rate of 12.09%.

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59 Blue Chip Financial Forecasts, June 1, 2020, at page 14 and July 31, 2020, at page 2.  
60 Derived on page 5 of Schedule DWD-7.

1 Q. WHAT IS THE COST RATE OF COMMON EQUITY BASED ON THE NON-  
2 PRICE REGULATED PROXY GROUP COMPARABLE IN TOTAL RISK TO  
3 THE UTILITY PROXY GROUP?

4 A. As shown on page 1 of Schedule DWD-7, the results of the common equity models  
5 applied to the Non-Price Regulated Proxy Group – which group is comparable in  
6 total risk to the Utility Proxy Group – are as follows: 11.50% (DCF), 12.86% (RPM),  
7 and 12.09% (CAPM). The average of the mean and median of these models is  
8 12.12%, which I used as the indicated common equity cost rates for the Non-Price  
9 Regulated Proxy Group.

10 **VIII. CONCLUSION OF COMMON EQUITY COST RATE BEFORE**  
11 **ADJUSTMENTS**

12 Q. WHAT IS THE INDICATED COMMON EQUITY COST RATE BEFORE  
13 ADJUSTMENTS?

14 A. By applying multiple cost of common equity models to the Utility Proxy Group and  
15 the Non-Price Regulated Proxy Group, the indicated range of common equity cost  
16 rates attributable to the Utility Proxy Group before any relative risk adjustments is  
17 between 9.85% and 10.96%. I used multiple cost of common equity models as  
18 primary tools in arriving at my recommended common equity cost rate, because no  
19 single model is so inherently precise that it can be relied on to the exclusion of other  
20 theoretically sound models. Using multiple models adds reliability to the estimated  
21 common equity cost rate, with the prudence of using multiple cost of common equity  
22 models supported in both the financial literature and regulatory precedent.

23 Based on these common equity cost rate results, I conclude that a range of  
24 common equity cost rates between 9.85% and 10.96% is reasonable and appropriate

1 before any adjustments for relative risk differences between SWEPCO and the  
2 Utility Proxy Group are made. The bottom of the indicated range (*i.e.*, 9.85%) was  
3 calculated by averaging the average of all model results (10.96%) with the lowest  
4 model result (8.73%), and the top of the indicated range is the approximate average  
5 of all model results. I have chosen this indicated range of common equity cost rates  
6 applicable to the Utility Proxy Group in order to be conservative in view of current  
7 market volatility and uncertainty as discussed previously.

8 **IX. ADJUSTMENTS TO THE COMMON EQUITY COST RATE**

9 **A. Size Adjustment**

10 Q. DOES SWEPCO'S SMALLER SIZE RELATIVE TO THE UTILITY PROXY  
11 GROUP COMPANIES INCREASE ITS BUSINESS RISK?

12 A. Yes. SWEPCO's smaller size relative to the Utility Proxy Group companies  
13 indicates greater relative business risk for the Company because, all else being equal,  
14 size has a material bearing on risk.

15 Size affects business risk because smaller companies generally are less able  
16 to cope with significant events that affect sales, revenues and earnings. For example,  
17 smaller companies face more risk exposure to business cycles and economic  
18 conditions, both nationally and locally. Additionally, the loss of revenues from a few  
19 larger customers would have a greater effect on a small company than on a bigger  
20 company with a larger, more diverse, customer base.

21 As further evidence that smaller firms are riskier, investors generally demand  
22 greater returns from smaller firms to compensate for less marketability and liquidity  
23 of their securities. Duff & Phelps' 2020 Valuation Handbook – U.S. Guide to Cost

1 of Capital (“D&P – 2020”) discusses the nature of the small-size phenomenon,  
2 providing an indication of the magnitude of the size premium based on several  
3 measures of size. In discussing “Size as a Predictor of Equity Returns,” D&P – 2020  
4 states:

5 The size effect is based on the empirical observation that companies  
6 of smaller size are associated with greater risk and, therefore, have  
7 greater cost of capital [sic]. The “size” of a company is one of the  
8 most important risk elements to consider when developing cost of  
9 equity capital estimates for use in valuing a business simply because  
10 size has been shown to be a *predictor* of equity returns. In other  
11 words, there is a significant (negative) relationship between size and  
12 historical equity returns - as size *decreases*, returns tend to *increase*,  
13 and vice versa. (footnote omitted) (emphasis in original)<sup>61</sup>

14 Furthermore, in “The Capital Asset Pricing Model: Theory and Evidence,”  
15 Fama and French note size is indeed a risk factor which must be reflected when  
16 estimating the cost of common equity. On page 14, they note:

17 . . . the higher average returns on small stocks and high book-to-  
18 market stocks reflect unidentified state variables that produce  
19 undiversifiable risks (covariances) in returns not captured in the  
20 market return and are priced separately from market betas.<sup>62</sup>

21 Based on this evidence, Fama and French proposed their three-factor model  
22 which includes a size variable in recognition of the effect size has on the cost of  
23 common equity.

24 Also, it is a basic financial principle that the use of funds invested, and not  
25 the source of funds, is what gives rise to the risk of any investment.<sup>63</sup> Eugene  
26 Brigham, a well-known authority, states:

27 A number of researchers have observed that portfolios of small-firms

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61 Duff & Phelps Valuation Handbook – U.S. Guide to Cost of Capital, Wiley 2020, at 4-1.

62 Fama & French, at 25-43.

63 Brealey, Richard A. and Myers, Stewart C., Principles of Corporate Finance (McGraw-Hill Book Company, 1996), at 204-205, 229.

1 (sic) have earned consistently higher average returns than those of  
2 large-firm stocks; this is called the “small-firm effect.” On the  
3 surface, it would seem to be advantageous to the small firms to  
4 provide average returns in a stock market that are higher than those of  
5 larger firms. In reality, it is bad news for the small firm; **what the**  
6 **small-firm effect means is that the capital market demands**  
7 **higher returns on stocks of small firms than on otherwise similar**  
8 **stocks of the large firms.** (emphasis added)<sup>64</sup>

9 Consistent with the financial principle of risk and return discussed above,  
10 increased relative risk due to small size must be considered in the allowed rate of  
11 return on common equity. Therefore, the Commission’s authorization of a cost rate  
12 of common equity in this proceeding must appropriately reflect the unique risks of  
13 SWEPCO, including its small relative size, which is justified and supported above by  
14 evidence in the financial literature.

15 Q. IS THERE A WAY TO QUANTIFY A RELATIVE RISK ADJUSTMENT DUE TO  
16 SWEPCO’S SMALL SIZE WHEN COMPARED TO THE UTILITY PROXY  
17 GROUP?

18 A. Yes. SWEPCO has greater relative risk than the average utility in the Utility Proxy  
19 Group because of its smaller size, as measured by an estimated market capitalization  
20 of common equity for SWEPCO.

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64 Brigham, Eugene F., Fundamentals of Financial Management, Fifth Edition (The Dryden Press, 1989), at 623.

**Table 10: Size as Measured by Market Capitalization for SWEPCO's Electric Operations and the Utility Proxy Group**

	Market Capitalization* (\$ Millions)	Times Greater than The Company
SWEPCO	\$1,709	
Utility Proxy Group	\$14,860	8.7x
*From page 1 of Schedule DWD-8.		

SWEPCO's estimated market capitalization was \$1,709 million as of July 31, 2020, compared with the market capitalization of the average company in the Utility Proxy Group of \$14,860 million as of July 31, 2020. The average company in the Utility Proxy Group has a market capitalization 8.7 times the size of SWEPCO's estimated market capitalization.

As a result, it is necessary to upwardly adjust the indicated range of common equity cost rates attributable to the Utility Proxy Group to reflect SWEPCO's greater risk due to their smaller relative size. The determination is based on the size premiums for portfolios of New York Stock Exchange, American Stock Exchange, and NASDAQ listed companies ranked by deciles for the 1926 to 2019 period. The average size premium for the Utility Proxy Group with a market capitalization of \$14,860 million falls in the second decile, while the Company's estimated market capitalization of \$1,709 million places it in the sixth decile. The size premium spread between the second decile and the sixth decile is 0.84%. Even though an 0.84% upward size adjustment is indicated, I applied a size premium of 0.20% to the Company's indicated common equity cost rate.

1 Q. SINCE SWEPCO IS PART OF A LARGER COMPANY, WHY IS THE SIZE OF  
2 THE TOTAL COMPANY NOT MORE APPROPRIATE TO USE WHEN  
3 DETERMINING THE SIZE ADJUSTMENT?

4 A. The return derived in this proceeding will not apply to AEP's operations as a whole,  
5 but only SWEPCO's. AEP is the sum of its constituent parts, including those  
6 constituent parts' ROEs. Potential investors in the Parent are aware that it is a  
7 combination of operations in each state, and that each state's operations experience  
8 the operating risks specific to their jurisdiction. The market's expectation of AEP's  
9 return is commensurate with the realities of the Company's composite operations in  
10 each of the states in which it operates.

11 **B. Credit Risk Adjustment**

12 Q. PLEASE DISCUSS YOUR PROPOSED CREDIT RISK ADJUSTMENT.

13 A. SWEPCO's long-term issuer ratings are Baa2 and A- from Moody's Investors  
14 Services and S&P, respectively, compared to the average long-term issuer ratings for  
15 the Utility Proxy Group of A3 and BBB+, respectively.<sup>65</sup> Hence, an upward credit  
16 risk adjustment is necessary to reflect the lower credit rating, *i.e.*, Baa2, of SWEPCO  
17 relative to the A3 average Moody's bond rating of the Utility Proxy Group.<sup>66</sup>

18 An indication of the magnitude of the necessary upward adjustment to reflect  
19 the greater credit risk inherent in a Baa2 bond rating relative to the Utility Proxy  
20 Group average rating of A3 is two-thirds of a recent three-month average spread  
21 between Moody's A2 and Baa2-rated public utility bond yields of 0.41%, shown on

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65 Source: S&P Global Market Intelligence.

66 As shown on page 5 of Schedule DWD-4.



1 page 4 of Schedule DWD-4, or 0.27%.<sup>67</sup>

2 **C. Flotation Costs**

3 Q. DID YOU PERFORM ANY ANALYSES RELATED TO FLOTATION COSTS IN  
4 ESTIMATING THE COMPANY'S ROE?

5 A. No, I did not. While flotation costs are necessary expenses associated with obtaining  
6 the capital used to finance utility assets (and, therefore, should be considered in  
7 determining the ROE), I recognize that the Commission typically has not included  
8 flotation costs in arriving at its ROE determinations. Consequently, I have not  
9 performed any analyses regarding flotation costs in this proceeding.

10 Q. WHAT IS THE INDICATED COST OF COMMON EQUITY AFTER YOUR  
11 COMPANY-SPECIFIC ADJUSTMENTS?

12 A. Applying the 0.20% size adjustment and the 0.27% credit risk adjustment, to the  
13 indicated range of common equity cost rates between 9.85% and 10.96% results in a  
14 Company-specific range of common equity rates between 10.32% and 11.43%. In  
15 consideration of both of these indicated ranges, I recommend an ROE of 10.35% for  
16 SWEPCO in this proceeding.

17 **X. CONCLUSION**

18 Q. WHAT IS YOUR RECOMMENDED ROE FOR SWEPCO?

19 A. Given the discussion above and the results from the analyses, I recommend that an  
20 ROE of 10.35% is appropriate for the Company at this time.

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67 0.27% = 0.41% \* (2/3).

1 Q. IN YOUR OPINION, IS YOUR PROPOSED ROE OF 10.35% FAIR AND  
2 REASONABLE TO SWEPKO AND ITS CUSTOMERS?

3 A. Yes, it is.

4 Q. IN YOUR OPINION, IS SWEPKO'S PROPOSED CAPITAL STRUCTURE  
5 CONSISTING OF 50.63% LONG-TERM DEBT AND 49.37% COMMON  
6 EQUITY FAIR AND REASONABLE?

7 A. Yes, it is.

8 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

9 A. Yes, it does.

Southwestern Electric Power Company  
Table of Contents  
Supporting Schedules Accompanying the Direct Testimony of  
Dylan W. D'Ascendis, CRRA, CVA

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Estimated Market Capitalization for Southwestern Electric Power Company and the Utility Proxy Group	DWD-8

Southwestern Electric Power Company  
Recommended Capital Structure and Cost Rates  
for Ratemaking Purposes

<u>Type Of Capital</u>	<u>Ratios (1)</u>	<u>Cost Rate</u>	<u>Weighted Cost Rate</u>
Long-Term Debt	50.63%	4.18% (1)	2.11%
Common Equity	<u>49.37%</u>	10.35% (2)	<u>5.11%</u>
Total	<u>100.00%</u>		<u>7.22%</u>

Notes:

- (1) Company-Provided
- (2) From page 2 of this Schedule.

Southwestern Electric Power Company  
Brief Summary of Common Equity Cost Rate

Line No.	Principal Methods	Proxy Group of Fourteen Electric Companies
1.	Discounted Cash Flow Model (DCF) (1)	8.73%
2.	Risk Premium Model (RPM) (2)	10.54%
3.	Capital Asset Pricing Model (CAPM) (3)	12.46%
4.	Market Models Applied to Comparable Risk, Non-Price Regulated Companies (4)	<u>12.12%</u>
5.	Indicated Range of Common Equity Cost Rates before Adjustment for Company-Specific Risk	9.85% - 10.96%
6.	Size Risk Adjustment (5)	0.20%
7.	Credit Risk Adjustment (6)	<u>0.27%</u>
8.	Indicated Range of Common Equity Cost Rates after Adjustment	<u><u>10.32% - 11.43%</u></u>
9.	Recommended Common Equity Cost Rate	<u><u>10.35%</u></u>

- Notes:
- (1) From Schedule DWD-3.
  - (2) From page 1 of Schedule DWD-4.
  - (3) From page 1 of Schedule DWD-5.
  - (4) From page 1 of Schedule DWD-7.
  - (5) Adjustment to reflect the Company's greater business risk due to its smaller size relative to the Utility Proxy Group as detailed in Mr. D'Ascendis' direct testimony.
  - (6) Company-specific risk adjustment to reflect SWEPCO's greater credit risk compared to the Utility Proxy Group. SWEPCO's Moody's bond rating of Baa2 is riskier than the Utility Proxy Group's Moody's bond rating of A3. An upward adjustment of 2/3 of the spread between A2 and Baa2 public utility bond yields (as shown on page 4 of Schedule DWD-4) is appropriate.

Southwestern Electric Power Company  
CAPITALIZATION AND FINANCIAL STATISTICS (1)  
2015 - 2019, Inclusive

	2019	2018	2017	2016	2015	
	(MILLIONS OF DOLLARS)					
CAPITALIZATION STATISTICS						
AMOUNT OF CAPITAL EMPLOYED						
TOTAL PERMANENT CAPITAL	\$ 5,000 942	\$ 4,928 897	\$ 4,605 707	\$ 4,820 200	\$ 4,374 666	
SHORT-TERM DEBT	59 860	-	118 680	-	58 330	
TOTAL-CAPITAL EMPLOYED	<u>\$ 5,060 802</u>	<u>\$ 4,928 897</u>	<u>\$ 4,724 387</u>	<u>\$ 4,820 200</u>	<u>\$ 4,432 996</u>	
INDICATED AVERAGE CAPITAL COST RATES (2)						
TOTAL DEBT	4 11 %	4 51 %	4 49 %	4 91 %	5 49 %	
CAPITAL STRUCTURE RATIOS						
BASED ON TOTAL PERMANENT CAPITAL						5 YEAR AVERAGE
LONG-TERM DEBT	51 20 %	53 03 %	51 48 %	54 05 %	50 41 %	52 03 %
PREFERRED STOCK	-	-	-	-	-	-
COMMON EQUITY	48 80	46 97	48 52	45 95	49 59	47 97
TOTAL	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>
BASED ON TOTAL CAPITAL						
TOTAL DEBT, INCLUDING SHIORT-TERM	51 78 %	53 03 %	52 70 %	54 05 %	51 07 %	52 53 %
PREFERRED STOCK	-	-	-	-	-	-
COMMON EQUITY	48 22	46 97	47 30	45 95	48 93	47 47
TOTAL	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>	<u>100 00 %</u>
DIVIDEND PAYOUT RATIO	23 64 %	44 15 %	88 22 %	72 48 %	62 39 %	58 18 %
RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY	6 67 %	6 47 %	5 60 %	7 55 %	9 02 %	7 06 %
TOTAL DEBT / EBITDA (3)	5 09 x	4 98 x	4 83 x	4 96 x	3 92 x	4 76 x
FUNDS FROM OPERATIONS / TOTAL DEBT (4)	11 49 %	19 40 %	17 85 %	12 01 %	17 16 %	15 58 %
TOTAL DEBT / TOTAL CAPITAL	51 78 %	53 03 %	52 70 %	54 05 %	51 07 %	52 53 %

Notes

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization)
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less

Source of Information: Company audited financial statements

Proxy Group of Fourteen Electric Companies  
CAPITALIZATION AND FINANCIAL STATISTICS (1)  
2015 - 2019, Inclusive

	2019	2018	2017	2016	2015	
	(MILLIONS OF DOLLARS)					
<u>CAPITALIZATION STATISTICS</u>						
<u>AMOUNT OF CAPITAL EMPLOYED</u>						
TOTAL PERMANENT CAPITAL	\$19,269 964	\$17,567 886	\$16,616 842	\$15,844 640	\$14,799 184	
SHORT-TERM DEBT	\$530 136	\$605 674	\$625 260	\$462 079	\$479 850	
TOTAL CAPITAL EMPLOYED	<u>\$19,800 100</u>	<u>\$18,173 560</u>	<u>\$17,242 102</u>	<u>\$16,306 719</u>	<u>\$15,279 034</u>	
<u>INDICATED AVERAGE CAPITAL COST RATES (2)</u>						
TOTAL DEBT	4.43 %	4.63 %	4.63 %	4.85 %	4.65 %	
PREFERRED STOCK	5.44	5.22	5.28	5.42	5.39	
						<u>5 YEAR</u>
						<u>AVERAGE</u>
<u>CAPITAL STRUCTURE RATIOS</u>						
BASED ON TOTAL PERMANENT CAPITAL:						
LONG-TERM DEBT	52.11 %	51.53 %	50.40 %	50.28 %	49.69 %	50.80 %
PREFERRED STOCK	0.72	0.85	0.90	0.94	0.96	0.87
COMMON EQUITY	<u>47.17</u>	<u>47.62</u>	<u>48.70</u>	<u>48.78</u>	<u>49.35</u>	<u>48.33</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
BASED ON TOTAL CAPITAL						
TOTAL DEBT, INCLUDING SHORT-TERM	52.86 %	52.49 %	52.25 %	51.75 %	50.98 %	52.07 %
PREFERRED STOCK	0.70	0.83	0.84	0.90	0.94	0.84
COMMON EQUITY	<u>46.44</u>	<u>46.68</u>	<u>46.91</u>	<u>47.36</u>	<u>48.08</u>	<u>47.09</u>
TOTAL	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>FINANCIAL STATISTICS</u>						
<u>FINANCIAL RATIOS - MARKET BASED</u>						
EARNINGS / PRICE RATIO	4.86 %	4.94 %	4.60 %	4.58 %	4.70 %	4.73 %
MARKET / AVERAGE BOOK RATIO	206.49	197.18	204.94	167.90	161.63	187.63
DIVIDEND YIELD	3.14	3.46	3.23	3.49	3.61	3.39
DIVIDEND PAYOUT RATIO	66.12	48.51	76.76	53.36	59.95	60.94
<u>RATE OF RETURN ON AVERAGE BOOK COMMON EQUITY</u>						
	9.85 %	8.58 %	8.82 %	7.97 %	7.77 %	8.60 %
<u>TOTAL DEBT / EBITDA (3)</u>						
	4.50 x	4.97 x	4.03 x	5.27 x	4.33 x	4.62 x
<u>FUNDS FROM OPERATIONS / TOTAL DEBT (4)</u>						
	15.07 %	20.23 %	19.99 %	18.97 %	23.09 %	19.47 %
<u>TOTAL DEBT / TOTAL CAPITAL</u>						
	52.86 %	52.49 %	52.25 %	51.75 %	50.98 %	52.07 %

Notes.

- (1) All capitalization and financial statistics for the group are the arithmetic average of the achieved results for each individual company in the group, and are based upon financial statements as originally reported in each year.
- (2) Computed by relating actual total debt interest or preferred stock dividends booked to average of beginning and ending total debt or preferred stock reported to be outstanding.
- (3) Total debt relative to EBITDA (Earnings before Interest, Income Taxes, Depreciation and Amortization)
- (4) Funds from operations (sum of net income, depreciation, amortization, net deferred income tax and investment tax credits, less total AFUDC) plus interest charges as a percentage of total debt.

Source of Information: Company Annual Forms 10-K

Capital Structure Based upon Total Permanent Capital for the  
Proxy Group of Fourteen Electric Companies  
2015 - 2019, Inclusive

	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>2015</u>	<u>5 YEAR AVERAGE</u>
<u>ALLETE</u>						
Long-Term Debt	41.96 %	40.80 %	42.09 %	45.15 %	46.86 %	43.37 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	58.04	59.20	57.91	54.85	53.14	56.63
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Alliant Energy</u>						
Long-Term Debt	53.39 %	53.49 %	52.62 %	50.34 %	49.43 %	51.85 %
Preferred Stock	1.72	1.94	2.16	2.33	2.58	2.15
Common Equity	44.89	44.57	45.22	47.33	47.99	46.00
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Ameren Corp.</u>						
Long-Term Debt	53.29 %	52.05 %	51.52 %	50.11 %	50.65 %	51.52 %
Preferred Stock	0.81	0.88	0.92	0.98	0.99	0.92
Common Equity	45.90	47.07	47.56	48.91	48.36	47.56
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Duke Energy</u>						
Long-Term Debt	55.39 %	55.45 %	55.61 %	53.85 %	49.87 %	54.03 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	44.61	44.55	44.39	46.15	50.13	45.97
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Edison Int'l</u>						
Long-Term Debt	54.21 %	53.76 %	46.65 %	44.02 %	45.68 %	48.86 %
Preferred Stock	6.48	8.02	8.44	8.65	8.20	7.96
Common Equity	39.31	38.22	44.91	47.33	46.12	43.18
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Entergy Corp.</u>						
Long-Term Debt	63.12 %	64.08 %	64.80 %	64.16 %	58.19 %	62.87 %
Preferred Stock	0.78	0.87	0.85	0.88	1.39	0.95
Common Equity	36.10	35.05	34.35	34.96	40.42	36.18
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>IDACORP, Inc.</u>						
Long-Term Debt	42.70 %	43.63 %	43.68 %	44.77 %	45.62 %	44.08 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	57.30	56.37	56.32	55.23	54.38	55.92
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>NorthWestern Corp.</u>						
Long-Term Debt	52.27 %	51.98 %	50.26 %	52.05 %	53.08 %	51.93 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	47.73	48.02	49.74	47.95	46.92	48.07
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>



Capital Structure Based upon Total Permanent Capital for the  
Proxy Group of Fourteen Electric Companies  
2015 - 2019, Inclusive

	<u>2019</u>	<u>2018</u>	<u>2017</u>	<u>2016</u>	<u>2015</u>	<u>5 YEAR AVERAGE</u>
<u>OGE Energy</u>						
Long-Term Debt	43.56 %	44.00 %	43.78 %	43.31 %	45.31 %	43.99 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	56.44	56.00	56.22	56.69	54.69	56.01
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Otter Tail Corp</u>						
Long-Term Debt	46.88 %	44.74 %	41.31 %	44.56 %	45.17 %	44.53 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	53.12	55.26	58.69	55.44	54.83	55.47
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Pinnacle West Capital</u>						
Long-Term Debt	50.91 %	49.59 %	48.68 %	46.33 %	45.45 %	48.19 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	49.09	50.41	51.32	53.67	54.55	51.81
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>PNM Resources</u>						
Long-Term Debt	64.02 %	61.10 %	57.89 %	58.64 %	55.66 %	59.46 %
Preferred Stock	0.25	0.26	0.28	0.28	0.31	0.28
Common Equity	35.73	38.64	41.83	41.08	44.03	40.26
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Portland General</u>						
Long-Term Debt	50.06 %	49.72 %	50.10 %	50.06 %	49.39 %	49.87 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	49.94	50.28	49.90	49.94	50.61	50.13
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Xcel Energy Inc</u>						
Long-Term Debt	57.77 %	57.01 %	56.66 %	56.73 %	55.36 %	56.71 %
Preferred Stock	-	-	-	-	-	0.00
Common Equity	42.23	42.99	43.34	43.27	44.64	43.29
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>
<u>Proxy Group of Fourteen Electric Companies</u>						
Long-Term Debt	52.11 %	51.52 %	50.41 %	50.29 %	49.70 %	50.80 %
Preferred Stock	0.72	0.86	0.90	0.94	0.96	0.88
Common Equity	47.17	47.62	48.69	48.77	49.34	48.32
Total Capital	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>	<u>100.00 %</u>

Source of Information  
Annual Forms 10-K

Southwestern Electric Power Company  
Operating Subsidiary Company Capital Structures of the  
Proxy Group of Sixteen Electric Companies

Company Name	Parent Company Ticker	2019		
		Common Equity	Long-Term Debt	Total Capital
ALLETE (Minnesota Power)	ALE	59.59%	40.41%	100.00%
Superior Water, Light and Power Company	ALE	58.08%	41.92%	100.00%
Interstate Power and Light Company	LNT	50.23%	49.77%	100.00%
Wisconsin Power and Light Company	LNT	53.78%	46.22%	100.00%
Ameren Illinois Company	AEE	53.00%	47.00%	100.00%
Union Electric Company	AEE	51.90%	48.10%	100.00%
Duke Energy Carolinas, LLC	DUK	52.11%	47.89%	100.00%
Duke Energy Florida, LLC	DUK	49.91%	50.09%	100.00%
Duke Energy Indiana, LLC	DUK	52.84%	47.16%	100.00%
Duke Energy Kentucky, Inc.	DUK	49.37%	50.63%	100.00%
Duke Energy Ohio, Inc.	DUK	65.22%	34.78%	100.00%
Duke Energy Progress, LLC	DUK	51.29%	48.71%	100.00%
Southern California Edison Company	EIX	50.43%	49.57%	100.00%
Entergy Arkansas, LLC	ETR	47.90%	52.10%	100.00%
Entergy Louisiana, LLC	ETR	47.47%	52.53%	100.00%
Entergy Mississippi, LLC	ETR	48.60%	51.40%	100.00%
Entergy New Orleans, LLC	ETR	49.26%	50.74%	100.00%
Entergy Texas, Inc.	ETR	50.43%	49.57%	100.00%
Idaho Power Company	IDA	55.14%	44.86%	100.00%
NorthWestern Corporation	NWE	47.59%	52.41%	100.00%
Oklahoma Gas and Electric Company	OGE	55.15%	44.85%	100.00%
Otter Tail Power Company	OTTR	51.12%	48.88%	100.00%
Public Service Company of New Mexico	PNM	45.23%	54.77%	100.00%
Texas-New Mexico Power Company	PNM	52.74%	47.26%	100.00%
Arizona Public Service Company	PNW	52.80%	47.20%	100.00%
Portland General Electric Company	POR	49.85%	50.15%	100.00%
Northern States Power Company - MN	XEL	52.20%	47.80%	100.00%
Northern States Power Company - WI	XEL	54.23%	45.77%	100.00%
Public Service Company of Colorado	XEL	56.32%	43.68%	100.00%
Southwestern Public Service Company	XEL	54.14%	45.86%	100.00%
	Mean	<u>52.26%</u>	<u>47.74%</u>	<u>100.00%</u>
	Median	<u>52.00%</u>	<u>48.00%</u>	<u>100.00%</u>

Source: S&P Global Market Intelligence

Southwestern Electric Power Company  
Indicated Common Equity Cost Rate Using the Discounted Cash Flow Model for the  
Proxy Group of Fourteen Electric Companies

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]
Proxy Group of Fourteen Electric Companies	Average Dividend Yield (1)	Value Line Projected Five Year Growth in EPS (2)	Zack's Five Year Projected Growth Rate in EPS	Bloomberg's Five Year Projected Growth Rate in EPS	Yahoo! Finance Projected Five Year Growth in EPS	Average Projected Five Year Growth in EPS (3)	Adjusted Dividend Yield (4)	Indicated Common Equity Cost Rate (5)
ALLETE	4.34 %	5.50 %	NA %	6.40 %	7.00 %	6.30 %	4.48 %	10.78 %
Akiant Energy	3.09	6.50	5.50	5.46	5.30	5.69	3.18	8.87
Ameren Corp	2.69	6.00	6.80	7.03	5.85	6.42	2.78	9.20
Duke Energy	4.62	5.00	4.30	4.02	3.81	4.28	4.72	9.00
Edison Int'l	4.49	NMF	3.30	4.26	1.40	2.99	4.56	7.55
Entergy Corp	3.78	3.00	5.70	5.06	5.95	4.93	3.87	8.80
IDACORP, Inc	2.98	3.50	2.60	3.00	2.60	2.93	3.02	5.95
NorthWestern Corp	4.27	1.50	3.40	3.80	3.71	3.10	4.34	7.44
OGE Energy	4.94	3.00	3.70	3.59	2.40	3.17	5.02	8.19
Otter Tail Corp	3.71	3.50	NA	NA	9.00	6.25	3.83	10.08
Pinnacle West Capital	4.08	4.00	4.70	4.78	4.36	4.46	4.17	8.63
PNM Resources	3.11	6.00	6.20	5.76	5.60	5.89	3.20	9.09
Portland General	3.73	4.00	5.30	4.72	4.45	4.62	3.82	8.44
Xcel Energy Inc	2.69	6.00	6.10	6.04	6.10	6.06	2.77	8.83
							Average	8.63 %
							Median	8.82 %
							Average of Mean and Median	8.73 %

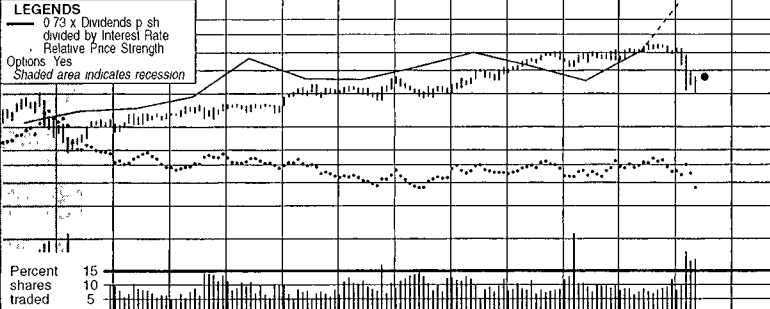
NA= Not Available  
NMF= Not Meaningful Figure

Notes

- (1) Indicated dividend at 07/31/2020 divided by the average closing price of the last 60 trading days ending 07/31/2020 for each company
- (2) From pages 2 through 15 of this Schedule
- (3) Average of columns 2 through 5 excluding negative growth rates
- (4) This reflects a growth rate component equal to one-half the conclusion of growth rate (from column 6) x column 1 to reflect the periodic payment of dividends (Gordon Model) as opposed to the continuous payment. Thus, for ALLETE,  $4.34\% \times (1 + (1/2 \times 6.30\%)) = 4.48\%$
- (5) Column 6 + column 7

Source of Information

Value Line Investment Survey  
www.zacks.com Downloaded on 07/31/2020  
www.yahoo.com Downloaded on 07/31/2020  
Bloomberg Professional Services

ALLETE NYSE-ALE			RECENT PRICE	59.20	P/E RATIO	19.4	(Trailing: 17.2) Median: 18.0	RELATIVE P/E RATIO	0.98	DIV'D YLD	4.3%	VALUE LINE																	
TIMELINESS	3	Lowered 4/5/19	High	Low	35.3	37.9	42.5	42.7	54.1	58.0	59.7	66.9	81.2	82.8	88.6	84.7		Target Price Range	2023	2024	2025								
SAFETY	2	New 10/1/04	<div>LEGENDS</div> <div>0.73 x Dividends p sh divided by Interest Rate</div> <div>Relative Price Strength</div> <div>Options: Yes</div> <div>Shaded area indicates recession</div> 																	120	100	80	64	48	32	24	20	16	12
TECHNICAL	3	Raised 5/1/20																		8									
BETA	85	(100 = Market)																		1 yr -26.4 -1.3 3 yr -12.9 5.2 5 yr 36.5 18.7									
18-Month Target Price Range																				% TOT RETURN 5/20									
Low-High Midpoint (% to Mid)																				THIS STOCK VL ARITH INDEX									
\$49-\$106 \$78 (30%)																				1 yr -26.4 -1.3 3 yr -12.9 5.2 5 yr 36.5 18.7									
2023-25 PROJECTIONS																													
Price Ann'l Total																													
High 90 Gain (+50%) 14%																													
Low 65 (+10%) 7%																													
Institutional Decisions																													
3Q2019 4Q2019 1Q2020																													
to Buy 125 158 124																													
to Sell 142 120 154																													
Hlds(000) 38347 38235 38410																													
Percent shares traded																													
15																													
10																													
5																													
2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021			© VALUE LINE PUBL. LLC																	23-25									
25.30	24.50	25.23	27.33	24.57	21.57	25.34	24.75	24.40	24.60	24.77	30.27	27.01	27.78	29.10	23.99	22.00	23.25	Revenues per sh			25.75								
2.97	3.85	4.14	4.42	4.23	3.57	4.35	4.91	5.01	5.35	5.68	6.79	7.08	6.59	7.37	7.24	7.05	7.65	"Cash Flow" per sh			9.00								
1.35	2.48	2.77	3.08	2.82	1.89	2.19	2.65	2.58	2.63	2.90	3.38	3.14	3.13	3.38	3.33	3.05	3.50	Earnings per sh <sup>A</sup>			4.25								
30	1.25	1.45	1.64	1.72	1.76	1.76	1.78	1.84	1.90	1.96	2.02	2.08	2.14	2.24	2.35	2.47	2.58	Div'd Dec'd per sh <sup>B</sup> +			2.90								
2.12	1.95	3.37	6.82	9.24	9.05	6.95	6.38	10.30	7.93	12.48	5.84	5.35	4.08	6.07	11.55	14.80	11.20	Cap'l Spending per sh			3.25								
21.23	20.03	21.90	24.11	25.37	26.41	27.26	28.78	30.48	32.44	35.06	37.07	38.17	40.47	41.86	43.17	46.30	47.65	Book Value per sh <sup>C</sup>			51.75								
29.70	30.10	30.40	30.80	32.60	35.20	35.80	37.50	39.40	41.40	45.90	49.10	49.60	51.10	51.50	51.70	52.75	53.50	Common Shs Outst'g <sup>D</sup>			54.25								
25.2	17.9	16.5	14.8	13.9	16.1	16.0	14.7	15.9	18.6	17.2	15.1	18.6	23.0	22.2	24.7	Avg Ann'l P/E Ratio			18.5										
1.33	95	89	79	84	1.07	1.02	92	101	105	91	76	98	116	120	132	Relative P/E Ratio			1.05										
9%	2.8%	3.2%	3.6%	4.4%	5.8%	5.0%	4.6%	4.5%	3.9%	3.9%	4.0%	3.6%	3.0%	3.0%	2.9%	Avg Ann'l Div'd Yield			3.8%										
CAPITAL STRUCTURE as of 3/31/20			2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021																	1245									
Total Debt \$1722.9 mill Due in 5 Yrs \$562.6 mill			75.3 93.8 97.1 104.7 124.8 163.4 155.3 159.2 149.6 124.0 1160																	185									
LT Debt \$1399.9 mill LT Interest \$61.1 mill			37.2% 27.6% 28.1% 21.5% 22.6% 19.4% 11.3% 14.8% 14.8% NMF NMF																	Nil									
(LT interest earned 3.6x)			8.9% 2.7% 5.3% 4.4% 6.3% 2.0% 1.4% 8% 7% 1.3% 2.0%																	2.0%									
Leases, Uncapitalized Annual rentals \$6.6 mill			44.2% 44.3% 43.7% 44.6% 44.2% 46.3% 42.0% 41.0% 39.9% 38.6% 41.0% 40.0%																	41.0%									
Pension Assets-12/19 \$699.6 mill			55.8% 55.7% 56.3% 55.4% 55.8% 53.7% 58.0% 59.0% 60.1% 61.4% 59.0%																	59.0%									
Oblig \$854.0 mill			1747.6 1937.2 2134.6 2425.9 2882.2 3388.9 3263.4 3507.4 3584.3 3632.8 4140																	4250									
Pfd Stock None			1805.6 1982.7 2347.6 2576.5 3286.4 3669.1 3741.2 3822.4 3904.4 4377.0 4945																	5320									
Common Stock 51,787,412 shs			5.4% 6.0% 5.6% 5.3% 5.2% 5.8% 5.8% 5.5% 5.8% 5.6% 4.5% 5.0%																	5.5%									
MARKET CAP. \$3.1 billion (Mid Cap)			7.7% 8.7% 8.1% 7.8% 7.8% 9.0% 8.2% 7.7% 8.1% 7.7% 6.5% 7.5%																	7.5%									
ELECTRIC OPERATING STATISTICS			7.7% 8.7% 8.1% 7.8% 7.8% 9.0% 8.2% 7.7% 8.1% 7.7% 6.5% 7.5%																	7.5%									
2017 2018 2019			1.5% 2.9% 2.3% 2.2% 2.5% 3.6% 2.8% 2.4% 2.7% 2.3% 1.5% 2.0%																	2.5%									
% Change Retail Sales (KWH)			81% 66% 71% 72% 67% 60% 68% 68%																	70%	81%	74%	Alt Div'ds to Net Prof	69%					
Avg Indust Use (MWH)			NA NA NA																										
Avg Indust Revs per KWH (¢)			NA NA NA																										
Capacity at Peak (MW)			NA NA NA																										
Peak Load, Winter (MW)			1599 1589 1573																										
Annual Load Factor (%)			NA NA NA																										
% Change Customers (avg)			NA NA NA																										
Fixed Charge Cov (%)			339 296 277																										
ANNUAL RATES			Past 10 Yrs Past 5 Yrs Est'd '17-'19																										
of change (per sh)			10 Yrs 5 Yrs to '23-'25																										
Revenues			1.0% 2.0% -1.0%																										
"Cash Flow"			5.5% 6.0% 4.0%																										
Earnings			2.5% 4.0% 5.5%																										
Dividends			3.0% 3.5% 4.5%																										
Book Value			5.0% 5.0% 3.5%																										
QUARTERLY REVENUES (\$mill.)			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																										
2017 365.6 353.3 362.5 337.9 1419.3																													
2018 358.2 344.1 348.0 448.3 1498.6																													
2019 357.2 290.4 288.3 304.6 1240.5																													
2020 311.6 280 280 288.4 1160																													
2021 330 300 300 315 1245																													
EARNINGS PER SHARE <sup>A</sup>			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																										
2017 .97 .72 .88 .56 3.13																													
2018 .99 .61 .59 1.18 3.38																													
2019 1.18 .64 .60 .92 3.33																													
2020 1.28 .50 .52 .75 3.05																													
2021 1.20 .70 .65 .95 3.50																													
QUARTERLY DIVIDENDS PAID <sup>B</sup> +			Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year																										
2016 .52 .52 .52 .52 2.08																													
2017 .535 .535 .535 .535 2.14																													
2018 .56 .56 .56 .56 2.24																													
2019 .5875 .5875 .5875 .5875 2.35																													
2020 .6175 .6175																													

**BUSINESS:** ALLETE, Inc is the parent of Minnesota Power, which supplies electricity to 146,000 customers in northeastern MN, & Superior Water, Light & Power in northwestern WI. Electric rev breakdown taconite mining/processing, 26%, paper/wood products, 9%, other industrial, 8%, residential, 12%, commercial, 13%, wholesale, 16% other, 16%. ALLETE Clean Energy (ACE) owns renewable energy projects. Acq'd U.S. Water Services 2/15, sold it 3/19. Generating sources: coal & lignite, 30%, wind, 11%, other, 5%, purchased, 54%. Fuel costs 31% of revs '19 deprec rate 3.3%. Has 1,400 employees. Chairman Alan R. Hodnik. President & CEO Bethany M. Owen. Inc. MN Address: 30 West Superior St., Duluth, MN 55802-2093. Tel. 218-279-5000. Internet: www.allete.com

**ALLETE's main utility subsidiary had its interim rate increase reduced.** Last November, Minnesota Power filed for a \$65.9 million (10.6%) rate increase, based on a return on equity of 10.05% and a common-equity ratio of 53.81%. At the start of 2020, Minnesota Power received an interim hike of \$36.1 million (5.8%). The interim hike was reduced to \$25.5 million (4.1%), and the effective date postponed to May 1st, in response to the economic problems caused by the coronavirus situation. This will result in a \$12 million revenue refund to customers. The utility also withdrew its rate application and will not refile a case before November 1, 2021. It may file as early as March 1st under certain conditions, such as a 50-megawatt loss of load for three months.

**We lowered our 2020 and 2021 earnings estimates.** The revenue refund will result in a charge of \$0.16 a share against second-quarter results, and having a lower interim rate hike will affect the company's earning power until Minnesota Power files its next rate case. In addition, revenues from large industrial customers will probably be lower in the last four months of 2020. (For now, there is no revenue impact because these customers put forth full power-demand nominations, before the economy worsened, through the end of August.) Putting it all together, we cut our 2020 share-net estimate by \$0.50, to \$3.05, and our 2021 expectation by \$0.30, to \$3.50. Due to the problems and increased uncertainty caused by the coronavirus, ALLETE has withdrawn its earnings guidance. Management hopes to update guidance with its second-quarter release.

**ALLETE Clean Energy is faring well.** Its wind projects are on track, and the coronavirus has not disrupted construction. Most significantly, a 300-megawatt project is scheduled for completion by yearend at an expected cost of \$450 million.

**This has been one of the poorest-performing stocks in this industry in 2020.** The price is down 27% in this time frame. Minnesota Power's service area has a much-larger industrial sector than most utilities, which worries investors. The dividend yield is above the industry average, and total return potential for the 18-month period is strong.

Paul E. Debbas, CFA

June 12, 2020

(A) Diluted EPS Excl nonrec gains (losses) '04, (25c), '05, (\$1.84), '15, (46c), '17, 25c, '19, 26c, gain (losses) on disc ops '04, \$2.57, '05, (16c), '06, (2c), '18 & '19 EPS don't sum due to rounding. Next earnings report due early Aug (B) Div'ds historically paid in early Mar, June, Sept and Dec (C) Div'd reinvest plan avail (D) Shareholder invest plan avail. (E) Incl deferred charges In '19 \$8.15/sh (D) In mill (E) Rate base Orig cost depr Rate allowed in MN on com eq in '18 9.25%, earned on avg com eq, '19 7.9% Regulatory Climate Avg

ergies projects Acq'd U.S. Water Services 2/15, sold it 3/19 Generating sources coal & lignite, 30%, wind, 11%, other, 5%, purchased, 54% Fuel costs 31% of revs '19 deprec rate 3.3% Has 1,400 employees Chairman Alan R. Hodnik President & CEO Bethany M. Owen Inc MN Address: 30 West Superior St., Duluth, MN 55802-2093 Tel 218-279-5000 Internet www.allete.com

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Paul E. Debbas, CFA

June 12, 2020

Company's Financial Strength A  
 Stock's Price Stability 95  
 Price Growth Persistence 80  
 Earnings Predictability 60

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ALLIANT ENERGY NDQ-LNT										RECENT PRICE	49.46	P/E RATIO	20.2	(Trailing: 19.6) Median: 17.0	RELATIVE P/E RATIO	1.03	DIV'D YLD	3.1%	VALUE LINE
TIMELINESS	2	Lowered 5/29/20	High	15.8	18.8	22.2	23.8	27.1	34.9	35.4	41.0	45.6	46.6	55.4	60.3				Target Price Range
SAFETY	2	Raised 9/28/07	Low	10.2	14.6	17.0	20.9	21.9	25.0	27.1	30.4	36.6	36.8	40.8	37.7				2023 2024 2025
TECHNICAL	2	Lowered 6/12/20	LEGENDS																
BETA	80	(100 = Market)	0.90 x Dividends p sh divided by Interest Rate Relative Price Strength 2-for-1 split 5/16 Options Yes Shaded area indicates recession																
18-Month Target Price Range																			
Low-High Midpoint (% to Mid)																			
\$38-\$83 \$61 (20%)																			
2023-25 PROJECTIONS																			
Price Gain Ann'l Total																			
High Low 55 40 (+10%) (-20%) 6% -1%																			
Institutional Decisions																			
3Q2019 4Q2019 1Q2020																			
to Buy 248 272 236																			
to Sell 233 209 272																			
Hld's(000) 185069 188011 182284																			
Percent 24																			
shares 16																			
traded 8																			
Alliant Energy, formerly called Interstate Energy Corporation, was formed on April 21, 1998 through the merger of WPL Holdings, IES Industries, and Interstate Power. WPL stockholders received one share of Interstate Energy stock for each WPL share, IES stockholders received 1.14 Interstate Energy shares for each IES share, and Interstate Power stockholders received 1.11 Interstate Energy shares for each Interstate Power share.																			
CAPITAL STRUCTURE as of 3/31/20																			
Total Debt \$6461.6 mill Due in 5 Yrs \$1000.0 mill																			
LT Debt \$5833.9 mill LT Interest \$250.0 mill																			
(LT interest earned 3.1x)																			
Pension Assets-12/19 \$930.4 mill Oblig \$1279.7 mill																			
Pfd Stock \$400.0 mill Pfd Div'd \$10.2 mill																			
16,000,000 shs																			
Common Stock 249,503,754 shs																			
MARKET CAP. \$12.3 billion (Large Cap)																			
ELECTRIC OPERATING STATISTICS																			
2017 2018 2019																			
% Change Retail Sales (KWh)																			
-1.0 -2.0 -2.2																			
Avg. Indust. Use (MWh)																			
11769 11830 11448																			
Avg. Indust. Revs per KWh (¢)																			
7.16 7.25 6.98																			
Capacity at Peak (Mw)																			
5375 5459 5626																			
Peak Load, Summer (Mw)																			
5375 5459 5626																			
Annual Load Factor (%)																			
NA NA NA																			
% Change Customers (yr-end)																			
+4 +4 +6																			
Fixed Charge Cov (%)																			
319 322 324																			
ANNUAL RATES																			
Past 10 Yrs. Past 5 Yrs. Est'd '17-'19																			
of change (per sh)																			
Revenues -5% -5% 2.0%																			
"Cash Flow" 4.5% 3.5% 6.0%																			
Earnings 5.0% 5.0% 6.5%																			
Dividends 7.0% 7.0% 5.5%																			
Book Value 4.0% 5.0% 7.5%																			
Cal-endar																			
QUARTERLY REVENUES (\$mill.)																			
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																			
2017 853.9 765.3 906.9 856.1 3382.2																			
2018 916.3 816.1 928.6 873.5 3534.5																			
2019 987.2 790.2 990.2 880.1 3647.7																			
2020 915.7 840 1020 899.3 3675																			
2021 1040 860 1040 910 3850																			
Cal-endar																			
EARNINGS PER SHARE A																			
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																			
2017 44 41 73 41 199																			
2018 52 43 87 37 219																			
2019 53 40 94 46 233																			
2020 72 43 90 40 245																			
2021 60 50 100 45 255																			
Cal-endar																			
QUARTERLY DIVIDENDS PAID B																			
Mar.31 Jun.30 Sep.30 Dec.31 Full Year																			
2016 295 295 295 295 118																			
2017 315 315 315 315 126																			
2018 335 335 335 335 134																			
2019 355 355 355 355 142																			
2020 38 38																			
(A) Diluted EPS Excl nonrecurr gains (losses) 10, (8c), 11, (12), 12, (8c) Next earnings rpt due early August (B) Dividends historically paid in mid-Feb. May, Aug. and Nov. Div'd																			
reinvest plan avail † Shareholder invest plan avail (C) Incl deferred chgs In '19 \$72.0 mill, \$0.29/sh. (D) In millions, adjusted for split (E) Rate base Onco cost Rates all'd on comp (E)																			
in IA in '19 10.0%, in WI in '19 Regul Clim																			
Wl, Above Avg., IA, Avg																			
Company's Financial Strength A																			
Stock's Price Stability 95																			
Price Growth Persistence 80																			
Earnings Predictability 80																			
Daniel Henigson, CFA June 12, 2020																			

AMEREN NYSE-AEE				RECENT PRICE	74.37	P/E RATIO	21.6	(Trailing: 23.5)	RELATIVE P/E RATIO	1.10	DIV'D YLD	2.8%	VALUE LINE					
TIMELINESS	3	Lowered 3/29/19	High	35.3	29.9	34.1	35.3	37.3	48.1	46.8	54.1	64.9	70.9	80.9	87.7			Target Price Range
SAFETY	2	Raised 6/20/14	Low	19.5	23.1	25.5	28.4	30.6	35.2	37.3	41.5	51.4	51.9	63.1	58.7			2023 2024 2025
TECHNICAL	1	Raised 5/8/20	LEGENDS 0.64 x Dividends p sh divided by Interest Rate Relative Price Strength Options: Yes Shaded area indicates recession															
BETA	80	(1.00 = Market)	Options: Yes Shaded area indicates recession															
18-Month Target Price Range			Low-High Midpoint (% to Mid)															
\$56-\$117			\$87 (15%)															
2023-25 PROJECTIONS			Ann'l Total Return															
Price Gain (+10%) 5%			Low Price Gain (-20%) -1%															
Institutional Decisions			3Q2019 4Q2019 1Q2020															
to Buy 257 266 242			Percent shares traded 30 20 10															
to Sell 257 265 273																		
Hld's(000) 186859 186367 187833																		
2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021			© VALUE LINE PUB. LLC 23-25															
26.43 33.12 33.30 36.23 36.92 29.87 31.77 31.04 28.14 24.06 24.95 25.13 25.04 25.46 25.73 24.00 22.05 22.70			Revenues per sh 24.25															
5.57 6.10 6.02 6.76 6.44 6.06 6.33 5.87 5.87 5.25 5.77 6.08 6.59 6.80 7.64 7.83 8.05 8.50			"Cash Flow" per sh 10.00															
2.82 3.13 2.66 2.98 2.88 2.78 2.77 2.47 2.41 2.10 2.40 2.38 2.68 2.77 3.32 3.35 3.45 3.65			Earnings per sh <sup>A</sup> 4.50															
2.54 2.54 2.54 2.54 2.54 1.54 1.54 1.56 1.60 1.60 1.61 1.66 1.72 1.78 1.85 1.92 2.01 2.11			Div'd Decl'd per sh <sup>B</sup> 2.45															
4.13 4.63 4.99 6.96 9.75 7.51 4.66 4.50 5.49 5.87 7.66 8.12 8.78 9.05 9.56 9.92 15.85 11.55			Cap'l Spending per sh 11.00															
29.71 31.09 31.86 32.41 32.80 33.08 32.15 32.64 27.27 26.97 27.67 28.63 29.27 29.61 31.21 32.73 35.70 37.40			Book Value per sh <sup>C</sup> 43.50															
195.20 204.70 206.60 208.30 212.30 237.40 240.40 242.60 242.63 242.63 242.63 242.63 242.63 244.50 246.20 254.00 260.00			Common Shs Outst'g <sup>D</sup> 275.00															
16.3 16.7 19.4 17.4 14.2 9.3 9.7 11.9 13.4 16.5 16.7 17.5 18.3 20.6 18.3 22.1 22.1 22.1			Avg Ann'l P/E Ratio 15.5															
86 89 105 92 85 62 62 75 85 93 88 88 96 104 .99 1.18 1.09 1.18			Relative P/E Ratio .85															
5.5% 4.9% 4.9% 4.9% 6.2% 6.0% 5.8% 5.3% 5.0% 4.6% 4.0% 4.0% 3.5% 3.1% 3.0% 2.6%			Avg Ann'l Div'd Yield 3.5%															
CAPITAL STRUCTURE as of 3/31/20			7638.0 7531.0 6828.0 5838.0 6053.0 6098.0 6076.0 6177.0 6291.0 5910.0 5600 5900															
Total Debt \$10350 mill Due in 5 Yrs \$2660 mill			668.0 602.0 589.0 518.0 593.0 585.0 659.0 683.0 821.0 834.0 875 950															
LT Debt \$9378 mill LT Interest \$428 mill			36.8% 37.3% 36.9% 37.5% 38.9% 38.3% 36.7% 38.2% 22.4% 17.9% 12.5% 12.5%															
(LT interest earned 3.4x)			7.8% 5.6% 6.1% 7.1% 5.7% 5.1% 4.1% 5.6% 6.9% 5.8% 6.0% 5.0%															
Leases, Uncapitalized Annual rentals \$8 mill			48.0% 45.3% 49.5% 45.2% 47.2% 49.3% 47.7% 49.2% 50.3% 52.1% 54.0% 51.0%															
Pension Assets-12/19 \$4564 mill			50.9% 53.7% 49.4% 53.7% 51.7% 49.7% 51.3% 49.8% 48.8% 47.1% 45.5% 48.5%															
Oblig \$4967 mill			15185 14738 13384 12190 12975 13968 13840 14420 15632 17116 20000 20150															
Pfd Stock \$142 mill Pfd Div'd \$6 mill			17853 18127 16096 16205 17424 18799 20113 21466 22810 24376 27225 28950															
807,595 sh \$3.50 to \$5.50 cum (no par), \$100			6.0% 5.6% 6.0% 5.6% 5.8% 5.3% 6.0% 6.4% 6.0% 5.5% 6.0%															
stated val., redeem \$102.176-\$110/sh, 618,323			8.5% 7.5% 8.7% 7.7% 8.7% 8.3% 9.1% 9.3% 10.6% 10.2% 9.5% 9.5%															
sh 4.00% to 6.625%, \$100 par, redeem \$100-			8.6% 7.5% 8.8% 7.8% 8.7% 8.3% 9.2% 9.4% 10.7% 10.3% 9.5% 9.5%															
\$104/sh.			3.8% 2.8% 3.0% 1.9% 2.9% 2.5% 3.3% 3.4% 4.8% 4.4% 4.0% 4.5%															
Common Stock 246,891,031 shs as of 4/30/20			56% 63% 66% 76% 67% 70% 64% 64%															
MARKET CAP. \$18 billion (Large Cap)			56% 63% 66% 76% 67% 70% 64% 64%															
ELECTRIC OPERATING STATISTICS			2017 2018 2019															
% Change Retail Sales (KWH)			-3.4 +5.6 -3.5															
Avg Indust Use (MWH)			NA NA NA															
Avg Indust Revs per KWH (¢)			NA NA NA															
Capacity at Peak (Mw)			NA NA NA															
Peak Load, Summer (Mw)			NA NA NA															
Annual Load Factor (%)			NA NA NA															
% Change Customers (yr-end)			NA NA NA															
Fixed Charge Cov (%)			350 313 307															
ANNUAL RATES			Past Past Est'd '17-'19															
of change (per sh) 10 Yrs 5 Yrs to '23-'25			-3.0% -5% -5%															
Revenues 1.5% 5.5% 5.0%																		
"Cash Flow" 1.0% 6.5% 6.0%																		
Earnings -2.0% 3.0% 5.0%																		
Dividends -5% 2.5% 5.5%																		
Book Value																		
Cal-endar			QUARTERLY REVENUES (\$mill.)				Full Year											
			Mar.31	Jun.30	Sep.30	Dec.31												
2017			1514	1538	1723	1402	6177.0											
2018			1585	1563	1724	1419	6291.0											
2019			1556	1379	1659	1316	5910.0											
2020			1440	1300	1600	1260	5600											
2021			1600	1350	1650	1300	5900											
Cal-endar			EARNINGS PER SHARE <sup>A</sup>				Full Year											
			Mar.31	Jun.30	Sep.30	Dec.31												
2017			.42	.79	1.18	.39	2.77											
2018			.62	.97	1.45	.28	3.32											
2019			.78	.72	1.47	.38	3.35											
2020			.59	.80	1.61	.45	3.45											
2021			.65	.85	1.70	.45	3.65											
Cal-endar			QUARTERLY DIVIDENDS PAID <sup>B</sup>				Full Year											
			Mar.31	Jun.30	Sep.30	Dec.31												
2016			.425	.425	.425	.44	1.72											
2017			.44	.44	.44	.4575	1.78											
2018			.4575	.4575	.4575	.475	1.85											
2019			.475	.475	.475	.495	1.92											
2020			.495	.495														
(A) Dil EPS Excl nonrec gain (losses) '05, '11(c), '10, (\$2.19), '11, (\$32c), '12, (\$6.42), '17, (\$36c), gain (loss) from disc ops '13, (\$92c), '15, 21c '17 EPS don't sum due to rounding			Next egs. report due early Aug (B) Div'd pd late Mar, June, Sept., & Dec (C) Div'd rein plan avail (D) Incl intang In '19 \$5.70/sh (D) In mill (E) Rate base Orig cost depr Rate															
			all'd on com eq in MO in '20 elec, none, in '11 gas, none, in IL in '14 elec, 8.7%, in '18 gas, 9.87%, earned on avg com eq, '19 10.5% Reg Climate MO, Avg., IL, Below Avg.															
			Company's Financial Strength A Stock's Price Stability 95 Price Growth Persistence 80 Earnings Predictability 85															
			To subscribe call 1-800-VALUELINE															

DUKE ENERGY NYSE-DUK		RECENT PRICE	82.63	P/E RATIO	16.2	(Trailing: 16.3) (Median: 18.0)	RELATIVE P/E RATIO	0.98	DIV'D YLD	4.6%	VALUE LINE										
TIMELINESS	3 Lowered 3/13/20	High	53.8	55.8	66.4	71.1	75.5	87.3	90.0	87.8	91.8	91.4	97.4	103.8	Target Price	Range					
SAFETY	2 New 6/1/07	Low	35.2	46.4	50.6	59.6	64.2	67.1	65.5	70.2	76.1	72.0	82.5	62.1	2023	2024	2025				
TECHNICAL	3 Raised 4/3/20	<div>LEGENDS</div> <div>0.54 x Dividends p sh divided by Interest Rate Relative Price Strength 1-for-3 Rev split 7/12 Options: Yes Shaded area indicates recession</div> <div>1-for-3 Reverse</div>																			
BETA	85 (1.00 = Market)	<div>18-Month Target Price Range</div> <div>Low-High Midpoint (% to Mid)</div> <div>\$76-\$113 \$95 (15%)</div>																			
2023-25 PROJECTIONS		Price	105	Gain	(+25%)	Ann'l Total	10%	4%													
Institutional Decisions		High	105	Low	80	Percent	15	shares	10	traded	5										
		to Buy	682	to Sell	586	to Buy	682	to Sell	586	to Buy	682	to Sell	586	to Buy	682	to Sell	586				
		Hld's(000)	7059915	445072	476731	Hld's(000)	7059915	445072	476731	Hld's(000)	7059915	445072	476731	Hld's(000)	7059915	445072	476731				
2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	© VALUE LINE PUB. LLC	23-25		
--	--	25.32	30.24	31.15	29.18	32.22	32.63	27.88	34.84	33.84	34.10	32.49	33.66	33.73	34.21	33.25	33.95	Revenues per sh	36.25		
--	--	7.86	8.11	7.34	7.58	8.49	8.68	6.80	8.56	9.11	9.40	9.20	10.01	10.49	12.13	12.05	12.75	"Cash Flow" per sh	14.25		
--	--	2.76	3.60	3.03	3.39	4.02	4.14	3.71	3.98	4.13	4.10	3.71	4.22	4.13	5.07	5.10	5.30	Earnings per sh <sup>A</sup>	6.00		
--	--	--	2.58	2.70	2.82	2.91	2.97	3.03	3.09	3.15	3.24	3.36	3.49	3.64	3.75	3.82	3.89	Div'd Decl'd per sh <sup>B</sup>	4.10		
--	--	8.07	7.43	10.35	9.85	10.84	9.80	7.81	7.62	9.83	11.29	11.50	12.91	15.17	15.50	14.70	14.70	Cap'l Spending per sh	13.75		
--	--	62.30	50.40	49.51	49.85	50.84	51.14	58.04	58.54	57.81	57.74	58.62	59.63	60.27	61.20	63.80	65.35	Book Value per sh <sup>C</sup>	71.00		
--	--	418.96	420.62	423.96	436.29	442.96	445.29	704.00	706.00	707.00	688.00	700.00	700.00	727.00	733.00	764.00	770.00	Common Shs Outst'g <sup>D</sup>	785.00		
--	--	--	16.1	17.3	13.3	12.7	13.8	17.5	17.4	17.9	18.2	21.3	19.9	19.4	17.7	17.7	17.7	Avg Ann'l P/E Ratio	15.5		
--	--	--	85	104	89	81	87	111	98	94	92	112	100	105	95	95	95	Relative P/E Ratio	.85		
--	--	--	4.4%	5.2%	6.2%	5.7%	5.2%	4.7%	4.4%	4.3%	4.3%	4.3%	4.2%	4.5%	4.2%	4.2%	4.2%	Avg Ann'l Div'd Yield	4.4%		
CAPITAL STRUCTURE as of 12/31/19		14272	14529	19624	24598	23925	23925	23925	23925	23925	23925	23925	23925	23925	23925	23925	23925	23925			
Total Debt \$61261 mill Due in 5 Yrs \$20740 mill		1765 0	1839 0	2136 0	2813 0	2934 0	2854 0	2560 0	2963 0	2928 0	3755 0	3860	4170	25400	26150	25400	26150	Revenues (\$mill)	28500		
LT Debt \$54985 mill LT Interest \$2155 mill		32.6%	31.3%	30.2%	32.6%	30.6%	32.2%	31.0%	30.4%	14.2%	12.7%	12.0%	12.0%	12.0%	12.0%	12.0%	12.0%	Income Tax Rate	12.0%		
Incl \$969 mill capitalized leases (LT interest earned 2.8x)		22.7%	23.2%	22.3%	8.8%	7.2%	9.2%	11.7%	12.3%	13.0%	7.9%	9.0%	8.0%	8.0%	8.0%	8.0%	8.0%	AFUDC % to Net Profit	8.0%		
Leases, Uncapitalized Annual rentals \$268 mill		44.3%	45.1%	47.0%	48.0%	47.7%	48.6%	52.6%	54.0%	53.8%	54.0%	52.5%	53.0%	53.0%	53.0%	53.0%	53.0%	Long-Term Debt Ratio	53.5%		
Pension Assets-12/19 \$8910 mill		55.7%	54.9%	52.9%	52.0%	52.3%	51.4%	47.4%	46.0%	46.2%	44.1%	45.5%	45.5%	45.5%	45.5%	45.5%	45.5%	Common Equity Ratio	45.0%		
Oblig \$8231 mill		40457	41451	77307	79482	78088	77222	86609	90774	94940	101807	106650	110725	106650	110725	106650	110725	Total Capital (\$mill)	123600		
Pfd Stock \$1962 mill Pfd Div'd \$58 mill		40344	42661	68558	69490	70046	75709	82520	86391	91694	102127	108475	114050	108475	114050	108475	114050	Net Plant (\$mill)	128400		
40 mill shs 5.75%, cum, \$25 liq value, redeemable at \$25.50 prior to 6/15/24, 1 mill shs 4.875%, cum, \$10000 liq value		5.5%	5.6%	3.6%	4.6%	4.8%	4.8%	4.0%	4.3%	4.2%	4.8%	4.5%	5.0%	5.0%	5.0%	5.0%	5.0%	Return on Total Cap'l	5.0%		
Common Stock 733,321,965 shs as of 1/31/20		7.8%	8.1%	5.2%	6.8%	7.2%	7.2%	6.2%	7.1%	6.7%	8.0%	7.5%	8.0%	8.0%	8.0%	8.0%	8.0%	Return on Shr. Equity	8.0%		
MARKET CAP. \$61 billion (Large Cap)		7.8%	8.1%	5.2%	6.8%	7.2%	7.2%	6.2%	7.1%	6.7%	8.0%	7.5%	8.0%	8.0%	8.0%	8.0%	8.0%	Return on Com Equity <sup>E</sup>	8.5%		
ELECTRIC OPERATING STATISTICS		2.1%	2.2%	.9%	1.5%	1.7%	1.5%	.6%	1.2%	1.0%	2.4%	2.0%	2.0%	2.0%	2.0%	2.0%	2.0%	Retained to Com Eq	2.5%		
		73%	72%	82%	78%	76%	79%	91%	83%	84%	71%	77%	74%	74%	74%	74%	74%	All Div'ds to Net Prof	70%		
		2017	2018	2019	2017	2018	2019	2017	2018	2019	2017	2018	2019	2017	2018	2019	2017	2018	2019		
% Change Retail Sales (KWH)		-2.0	+3.9	-9	-2.0	+3.9	-9	-2.0	+3.9	-9	-2.0	+3.9	-9	-2.0	+3.9	-9	-2.0	+3.9	-9		
Avg Indust Use (MWH)		2914	2953	2934	2914	2953	2934	2914	2953	2934	2914	2953	2934	2914	2953	2934	2914	2953	2934		
Avg Indust Revs per KWH (¢)		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Capacity at Peak (MW)		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Peak Load, Summer (MW)		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Annual Load Factor (%)		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
% Change Customers (avg)		+1.3	+1.4	+1.5	+1.3	+1.4	+1.5	+1.3	+1.4	+1.5	+1.3	+1.4	+1.5	+1.3	+1.4	+1.5	+1.3	+1.4	+1.5		
Fixed Charge Cov (%)		272	218	233	272	218	233	272	218	233	272	218	233	272	218	233	272	218	233		
ANNUAL RATES		Past	Past	Est'd '17-'19	Past	Past	Est'd '17-'19	Past	Past	Est'd '17-'19	Past	Past	Est'd '17-'19	Past	Past	Est'd '17-'19	Past	Past	Est'd '17-'19		
of change (per sh)		10 Yrs.	5 Yrs.	to '23-'25	10 Yrs.	5 Yrs.	to '23-'25	10 Yrs.	5 Yrs.	to '23-'25	10 Yrs.	5 Yrs.	to '23-'25	10 Yrs.	5 Yrs.	to '23-'25	10 Yrs.	5 Yrs.	to '23-'25		
Revenues		1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%	1.0%		
"Cash Flow"		3.5%	6.0%	4.5%	3.5%	6.0%	4.5%	3.5%	6.0%	4.5%	3.5%	6.0%	4.5%	3.5%	6.0%	4.5%	3.5%	6.0%	4.5%		
Earnings		3.0%	2.5%	5.0%	3.0%	2.5%	5.0%	3.0%	2.5%	5.0%	3.0%	2.5%	5.0%	3.0%	2.5%	5.0%	3.0%	2.5%	5.0%		
Dividends		3.0%	3.0%	2.0%	3.0%	3.0%	2.0%	3.0%	3.0%	2.0%	3.0%	3.0%	2.0%	3.0%	3.0%	2.0%	3.0%	3.0%	2.0%		
Book Value		2.0%	1.0%	2.5%	2.0%	1.0%	2.5%	2.0%	1.0%	2.5%	2.0%	1.0%	2.5%	2.0%	1.0%	2.5%	2.0%	1.0%	2.5%		
Cal-endar		Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31
2017		5729	5555	6482	5799	5729	5555	6482	5799	5729	5555	6482	5799	5729	5555	6482	5799	5729	5555	6482	5799
2018		6135	5643	6628	6115	6135	5643	6628	6115	6135	5643	6628	6115	6135	5643	6628	6115	6135	5643	6628	6115
2019		6163	5873	6940	6103	6163	5873	6940	6103	6163	5873	6940	6103	6163	5873	6940	6103	6163	5873	6940	6103
2020		6250	5900	7000	6250	6250	5900	7000	6250	6250	5900	7000	6250	6250	5900	7000	6250	6250	5900	7000	6250
2021		6450	6050	7200	6450	6450	6050	7200	6450	6450	6050	7200	6450	6450	6050	7200	6450	6450	6050	7200	6450
Cal-endar		Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31
2017		1.02	.98	1.36	.86	1.02	.98	1.36	.86	1.02	.98	1.36	.86	1.02	.98	1.36	.86	1.02	.98	1.36	.86
2018		1.17	.71	1.63	.61	1.17	.71	1.63	.61	1.17	.71	1.63	.61	1.17	.71	1.63	.61	1.17	.71	1.63	.61
2019		1.24	1.12	1.82	.89	1.24	1.12	1.82	.89	1.24	1.12	1.82	.89	1.24	1.12	1.82	.89	1.24	1.12	1.82	.89
2020		1.30	1.05	1.80	.95	1.30	1.05	1.80	.95	1.30	1.05	1.80	.95	1.30	1.05	1.80	.95	1.30	1.05	1.80	.95
2021		1.35	1.10	1.90	.95	1.35	1.10	1.90	.95	1.35	1.10	1.90	.95	1.35	1.10	1.90	.95	1.35	1.10	1.90	.95
Cal-endar		Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31	Mar.31	Jun.30	Sep.30	Dec.31
2016		825	825	.855	855	825	825	.855	855	825	825	.855	855	825	825	.855	855	825	825	.855	855
2017		855	855	.89	89	855	855	.89	89	855	855	.89	89	855	855	.89	89	855	855	.89	89
2018		89	89	.927	928	89	89	.927	928	89	89	.927	928	89	89	.927	928	89	89	.927	928
2019		927	928	.945	945	927	928	.945	945	927	928	.945	945	927	928	.945	945	927	928	.945	945
2020		.945				.945				.945				.945				.945</			





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RECENT PRICE

90.28

P/E RATIO

19.8

(Trailing: 20.0 Median: 16.0)

RELATIVE P/E RATIO

0.96

DIV'D YLD

3.1%

VALUE LINE

High Low

32 8 20 9

37 8 30 0

42 7 33 9

45 7 38 2

54 7 43 1

70 1 50 2

70 5 55 4

83 4 65 0

100 0 77 5

102 4 79 6

114 0 89 3

113 6 69 1

Target Price Range

2023 2024 2025

LEGENDS

0.80 x Dividends p.sh. divided by Interest Rate

Relative Price Strength

Options: Yes

Shaded area indicates recession

160

120

100

80

60

50

40

30

20

15

18-Month Target Price Range

Low-High

Midpoint (% to Mid)

\$71-\$145

\$108 (20%)

2023-25 PROJECTIONS

High Low

Price

Gain

Ann'l Total Return

Institutional Decisions

302019 402019 102020

To Buy 148 172 167

To Sell 165 157 174

Mid's (000) 39815 39667 39043

Percent shares traded 15 10 5

% TOT. RETURN 6/20

THIS STOCK VLARITH

1 yr -11.3 -5.1

3 yr 10.0 6.8

5 yr 76.9 24.4

2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021

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20.00 20.15 21.23 19.51 20.47 21.92 20.97 20.55 21.55 24.81 25.51 25.23 25.04 26.76 27.19 26.70 24.80 25.75

4.12 3.87 4.58 4.11 4.27 5.07 5.35 5.84 5.93 6.29 6.58 6.70 6.86 7.50 7.85 8.07 8.10 8.50

1.90 1.75 2.35 1.86 2.18 2.64 2.95 3.36 3.37 3.64 3.85 3.87 3.94 4.21 4.49 4.61 4.55 4.75

1.20 1.20 1.20 1.20 1.20 1.20 1.20 1.20 1.37 1.57 1.76 1.92 2.08 2.24 2.40 2.56 2.73 2.93

4.73 4.53 5.16 6.39 5.19 5.26 6.85 6.76 4.78 4.68 5.45 5.84 5.89 5.66 5.51 5.53 6.80 6.95

23.88 24.04 25.77 26.79 27.76 29.17 31.01 33.19 35.07 36.84 38.85 40.88 42.74 44.65 47.01 48.88 50.60 52.35

42.22 42.66 43.63 45.06 46.92 47.90 49.41 49.95 50.16 50.23 50.27 50.34 50.40 50.42 50.42 50.42 50.45 50.45

15.5 16.7 15.1 18.2 13.9 10.2 11.8 11.5 12.4 13.4 14.7 16.2 19.1 20.6 20.5 22.3 24.1 25.5

82 89 82 97 84 68 75 72 79 75 77 82 1.00 1.04 1.11 1.21 1.26 1.31

4.1% 4.1% 3.4% 3.5% 4.0% 4.5% 3.4% 3.1% 3.3% 3.2% 3.1% 3.1% 2.8% 2.6% 2.6% 2.5%

Revenues per sh 28.75

"Cash Flow" per sh 9.75

Earnings per sh A 5.50

Div'd Decl'd per sh B 3.55

Cap'l Spending per sh 7.00

Book Value per sh C 58.00

Common Shs Outst'g D 50.40

Avg Ann'l P/E Ratio 18.5

Relative P/E Ratio 1.05

Avg Ann'l Div'd Yield 3.5%

CAPITAL STRUCTURE as of 3/31/20

Total Debt \$1837.0 mill Due in 5 Yrs \$299.8 mill

LT Debt \$1837.0 mill LT Interest \$78.6 mill

(LT interest earned 3.6x)

Pension Assets-12/19 \$763.1 mill

Oblig \$1134.8 mill

Pfd Stock None

Common Stock 50,453,936 shs as of 4/24/20

MARKET CAP: \$4.6 billion (Mid Cap)

ELECTRIC OPERATING STATISTICS

2017 2018 2019

% Change Retail Sales (KWH) +2.6 +1.3

Avg Indust. Use (MWH) NA NA

Avg Indust. Pkws per KWH (c) 5.83 5.64 5.32

Capacity at Peak (MW) NA NA

Peak Load, Summer (MW) 3422 3392 3242

Annual Load Factor (%) NA NA

% Change Customers (yr end) +2.0 +2.5

Fixed Charge Cov (%) 329 309 307

ANNUAL RATES of change (per sh)

Past 10 Yrs. Past 5 Yrs. Est'd '17-'19 to '23-'25

Revenues 2.5% 2.5% 1.0%

"Cash Flow" 5.5% 4.5% 4.0%

Earnings 7.0% 4.0% 3.5%

Dividends 7.0% 9.0% 6.5%

Book Value 5.5% 5.0% 3.5%

QUARTERLY REVENUES (\$ mill.)

Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2017 302.6 333.0 408.3 305.6 1349.5

2018 310.1 340.0 408.8 311.9 1370.8

2019 350.3 316.9 386.3 292.9 1346.4

2020 291.0 309 375 275 1250

2021 305 325 385 285 1300

EARNINGS PER SHARE A

Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2017 .66 .99 1.80 .76 4.21

2018 .72 1.23 2.02 .52 4.49

2019 .84 1.05 1.78 .93 4.61

2020 .74 1.10 1.90 .81 4.55

2021 .85 1.15 2.00 .75 4.75

QUARTERLY DIVIDENDS PAID B

Cal-ender Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2016 .51 .51 .51 .55 2.08

2017 .55 .55 .55 .59 2.24

2018 .59 .59 .59 .63 2.40

2019 .63 .63 .63 .67 2.56

2020 .67 .67 .67 .67 2.56

BUSINESS. IDACORP, Inc is a holding company for Idaho Power Company, a regulated electric utility that serves 572,000 customers throughout a 24,000-square-mile area in southern Idaho and eastern Oregon (population 1.2 million). Most of the company's revenues are derived from the Idaho portion of its service area. Revenue breakdown: residential, 39%, commercial, 22%, industrial, 13%, irrigation, 10%, other, 16%. Generating sources: hydro, 45%, coal, 16%, gas, 11%, purchased, 28%. Fuel costs: 33% of revenues. '19 reported depreciation rate: 2.9%. Has 2,000 employees. Chairman: Richard J. Dahl. President & CEO: Lisa Grow. Incorporated: Idaho. Address: 1221 W. Idaho St., Boise, Idaho 83702. Telephone: 208-388-2200. Internet: www.idacorpinc.com

er growth to continue. The company might well benefit from an increase in data center customers, now that the state has eliminated the sales tax on data centers. Our estimate of \$4.75 a share would produce a 4% increase.

A regulatory mechanism is available to stabilize the utility's income, if needed. Idaho Power may use up to \$25 million of accumulated deferred investment tax credits annually if its return on equity falls below 9.4%. The company does not expect to use any of these credits in order to attain its earnings target for 2020.

The board of directors will probably raise the dividend in September. IDACORP's target for a payout ratio is 60%-70%, and management plans to recommend to the board annual increases of at least 5%. We estimate a hike of \$0.05 a share (7.5%) quarterly.

The stock price is down 15% in 2020. This is less than many utility issues. The dividend yield is below the utility mean. Total return potential is below the median for both the 18-month span and the 3- to 5-year period.

Paul E. Debbas, CFA

We expect record profits in 2021. The economy will likely be much better, with Moody's estimating economic growth of 5.0% in Idaho Power's service area. This should enable the utility's healthy custom-

er growth to continue. The company might well benefit from an increase in data center customers, now that the state has eliminated the sales tax on data centers. Our estimate of \$4.75 a share would produce a 4% increase.

A regulatory mechanism is available to stabilize the utility's income, if needed. Idaho Power may use up to \$25 million of accumulated deferred investment tax credits annually if its return on equity falls below 9.4%. The company does not expect to use any of these credits in order to attain its earnings target for 2020.

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Paul E. Debbas, CFA

July 24, 2020

<p>(A) Diluted EPS Excl nonrecurring gain (loss) '05, (24c), '06, '17c '17 + '19 earnings don't sum due to rounding Next earnings report due late July (B) Dividends historically paid in late</p>	<p>Feb, May, Aug, and Nov ■ Dividend reinvestment plan available ■ Shareholder investment plan available (C) Incl intangibles In '19 \$26 31/31 (D) In millions (E) Rate base, Net</p>	<p>original cost Rate allowed on common equity in '11 10% (imputed), earned on avg com eq, '19 9.6% Regulatory Climate Above Average</p>
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Company's Financial Strength	A
Stock's Price Stability	95
Price Growth Persistence	90
Earnings Predictability	95

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OTTER TAIL CORP. NDQ-OTTR

RECENT PRICE 42.00

P/E RATIO 20.5

(Trailing: 19.8 Median: 22.0)

RELATIVE P/E RATIO 1.04

DIV YLD 3.6%

VALUE LINE

TIMELINESS 3 Lowered 3/1/19

SAFETY 2 Raised 6/17/16

TECHNICAL 3 Raised 5/8/20

BETA 85 1.00 = Market

18-Month Target Price Range

Low-High Midpoint (% to Mid)

\$37-\$74 \$56 (30%)

2023-25 PROJECTIONS

High Low Price 60 (+45%) Gain 12% Ann'l Total Return 6%

Low 45 (+5%) 6%

Institutional Decisions

302019 402019 102020

to Buy 88 85 78

to Sell 61 69 84

Hld's(000) 18133 18484 18228

Percent shares traded 9 6 3

% TOT RETURN 5/20

THIS STOCK VL ARITH INDEX

1 yr -11.5 -1.3

3 yr 16.6 5.2

5 yr 86.6 18.7

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2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021

30.45 35.59 37.43 41.50 37.06 29.03 31.08 29.86 23.76 24.63 21.48 20.60 20.42 21.47 23.10 22.90 20.70 22.60

2.88 3.35 3.39 3.55 2.81 2.76 2.60 2.36 2.71 3.02 3.09 3.14 3.44 3.70 3.96 4.11 4.00 4.25

1.50 1.78 1.69 1.78 1.09 71 38 45 1.05 1.37 1.56 1.56 1.60 1.86 2.06 2.17 2.05 2.20

1.10 1.12 1.15 1.17 1.19 1.19 1.19 1.19 1.19 1.21 1.23 1.25 1.28 1.34 1.40 1.48 1.56

1.72 2.04 2.35 5.43 7.51 4.95 2.38 2.04 3.20 4.53 4.40 4.23 4.10 3.36 2.66 5.16 9.30 3.40

14.81 15.80 16.67 17.55 19.14 18.78 17.57 15.83 14.43 14.75 15.39 15.98 17.03 17.62 18.38 19.46 20.60 21.20

28.98 29.40 29.52 29.85 35.38 35.81 36.00 36.10 36.17 36.27 37.22 37.86 39.35 39.56 39.66 40.16 41.60 41.60

17.3 15.4 17.3 19.0 30.1 31.2 55.01 47.5 21.7 21.1 18.8 18.2 20.2 22.1 22.2 23.5

91 82 93 101 181 208 3.51 2.98 1.38 1.19 99 92 1.06 1.11 1.20 1.26

4.2% 4.1% 3.9% 3.5% 3.6% 5.4% 5.7% 5.6% 5.2% 4.1% 4.1% 4.3% 3.9% 3.1% 2.9% 2.7%

CAPITAL STRUCTURE as of 3/31/20

Total Debt \$744.5 mill Due in 5 Yrs \$190.3 mill

LT Debt \$724.3 mill LT Interest \$33.8 mill

(LT interest earned 4.1x)

Leases, Uncapitalized Annual rentals \$22.3 mill

Pension Assets-12/19 \$329.8 mill

Oblig \$384.8 mill

Pfd Stock None

Common Stock 40,416,779 shs as of 4/30/20

MARKET CAP: \$1.7 billion (Mid Cap)

ELECTRIC OPERATING STATISTICS

2017 2018 2019

% Change Retail Sales (KWH) +1.4 +3.4 -2

Avg Indstl Use (KWH) NA NA NA

Avg Indstl Rets per (KWH) 6.26 5.97 NA

Capacity at Peak (MW) 917 912 NA

Annual Load Factor (%) NA NA NA

% Change Customers (yr end) +5 +2 +1

Fixed Charge Cov (%) 608 409 407

ANNUAL RATES

Past 10 Yrs Past 5 Yrs Est'd '17-'19 of change (per sh)

Revenues -4.5% -6.0% 3.0%

"Cash Flow" 2.5% 5.0% 4.0%

Earnings 5.5% 9.0% 3.5%

Dividends 1.5% 2.5% 5.0%

Book Value -4.5% 4.0%

QUARTERLY REVENUES (\$ mil.)

Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2017 214.1 212.1 216.5 206.7 849.4

2018 241.2 226.3 227.7 221.2 916.4

2019 246.0 229.2 228.6 215.7 919.5

2020 234.7 200 215 210.3 860

2021 250 235 235 220 940

EARNINGS PER SHARE A

Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2017 49 42 45 50 186

2018 66 47 58 35 206

2019 66 39 62 51 217

2020 60 35 60 50 205

2021 65 40 65 50 220

QUARTERLY DIVIDENDS PAID B

Cal-endar Mar.31 Jun.30 Sep.30 Dec.31 Full Year

2016 3125 3125 3125 3125 125

2017 32 32 32 32 128

2018 335 335 335 335 134

2019 35 35 35 35 140

2020 37 37

BUSINESS: Otter Tail Corporation is the parent of Otter Tail Power Company, which supplies electricity to 132,000 customers in Minnesota (52% of retail electric revenues), North Dakota (38%), and South Dakota (10%). Electric rev. breakdown residential, 32%, commercial & farms, 36%, industrial, 30%, other, 2%. Generating sources coal, 45%, wind & hydro, 8%, other, 1%, purchased, 46%

2019 EPS don't sum due to rmdg Next eps rept due early Aug (B) Div'ds histor p'd in early Mar, Jun, Sept, & Dec Div'd reinv plan avail (C) Incl intang in '19

\$4.67/sh (D) In mill (E) Rate all'd on com eq in MN in '17 9.41%, in ND in '18 9.77%, in SD in '19 8.75%, earn avg com eq in '19 11.6% Reg Clim MN, ND, Avg, SD, Above Avg

OTTER TAIL POWER IS BUILDING SOME SIGNIFICANT CAPITAL PROJECTS. A \$258 million, 150-megawatt wind project, the largest project in the company's history, is on budget but slightly behind schedule. An in-service date by yearend is still achievable, but there is an increased risk of supply-chain and labor-related delays due to coronavirus. This is significant because the company might lose production tax credits if the project is not completed by yearend. Otter Tail is also building a \$158 million, 245-mw gas-fired facility. Completion is expected in late 2020 or early 2021. The company is financing these expenditures with a combination of long-term debt and common equity.

The reduction in earnings guidance didn't affect the stock price much. It came as no surprise to Wall Street that the economic troubles were hurting Otter Tail, especially its Manufacturing division. The price had already dropped significantly, and is down 18% in 2020. The dividend yield is about average for a utility. Total return potential is better for the 18-month span than for the 2023-2025 period.

Paul E. Debbas, CFA June 12, 2020

Company's Financial Strength A

Stock's Price Stability 95

Price Growth Persistence 65

Earnings Predictability 85

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(A) Dil EPS Excl nonrec gains (loss) '10, '44c, '11, '26c, '13, '2c, gains (losses) from disc ops '04, '06, '05, '35c, '06, '1e, '11, '11, '12, '12, '12, '13, '2c, '14, '2c, '15, '2c, '16, '1c, '17, '1c '19 EPS don't sum due to rmdg Next eps rept due early Aug (B) Div'ds histor p'd in early Mar, Jun, Sept, & Dec Div'd reinv plan avail (C) Incl intang in '19

\$4.67/sh (D) In mill (E) Rate all'd on com eq in MN in '17 9.41%, in ND in '18 9.77%, in SD in '19 8.75%, earn avg com eq in '19 11.6% Reg Clim MN, ND, Avg, SD, Above Avg

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PINNACLE WEST NYSE-PNW										RECENT PRICE	78.91	P/E RATIO	16.6 (Trailing: 16.1 Median: 16.0)	RELATIVE P/E RATIO	0.81	DIV'D YLD	4.1%	VALUE LINE						
TIMELINESS 3	Lowered 6/30/19	High Low	38.0 22.3	42.7 32.3	48.9 37.3	54.7 45.9	61.9 51.5	71.1 51.2	73.3 56.0	82.8 62.5	92.5 75.8	92.6 73.4	99.8 81.6	105.5 60.1										
SAFETY 1	Raised 5/3/13	LEGENDS										Target Price Range												
TECHNICAL 4	Lowered 6/19/20	0.63 x Dividends p.sh. divided by Interest Rate										2023 2024 2025												
BETA 85	(1.00 = Market)	Options: Yes																						
18-Month Target Price Range		Shaded area indicates recession																						
Low-High Midpoint (% to Mid)																								
\$60-\$134 \$97 (25%)																								
2023-25 PROJECTIONS																								
Price	115	Gain	+45%	Ann'l Total	13%																			
High Low	95	Low	95	Return	9%																			
Institutional Decisions																								
to Buy	302019	402019	102020	Percent	30																			
to Sell	245	221	207	shares	20																			
Hld's(000)	98235	98387	95773	traded	10																			
2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	© VALUE LINE PUB. LLC 23-25						
31.59	30.16	34.03	35.07	33.37	32.50	30.01	29.67	30.09	31.35	31.58	31.50	31.42	31.90	32.93	30.87	27.05	28.75	Revenues per sh	31.25					
6.93	5.76	9.70	9.29	8.13	8.08	6.85	7.52	7.92	8.15	8.09	9.09	9.39	9.79	11.41	11.13	11.30	12.00	"Cash Flow" per sh	14.00					
2.58	2.24	3.17	2.96	2.12	2.26	3.08	2.99	3.50	3.66	3.58	3.92	3.95	4.43	4.54	4.77	4.75	5.05	Earnings per sh <sup>A</sup>	5.75					
1.83	1.93	2.03	2.10	2.10	2.10	2.10	2.10	2.67	2.23	2.33	2.44	2.56	2.70	2.87	3.04	3.22	3.41	Div'd Decl'd per sh <sup>B</sup>	4.00					
5.86	6.39	7.59	9.37	9.46	7.64	7.03	8.26	8.24	9.36	8.38	9.84	11.64	12.80	10.73	10.76	12.10	15.20	Cap'l Spending per sh	11.75					
32.14	34.57	34.48	35.15	34.16	32.69	33.86	34.98	36.20	38.07	39.50	41.30	43.15	44.80	46.59	48.30	49.75	51.25	Book Value per sh <sup>C</sup>	57.25					
91.79	99.08	99.96	100.49	100.89	101.43	108.77	109.25	109.74	110.18	110.57	110.98	111.34	111.75	112.10	112.44	112.70	113.00	Common Shs Outst'g <sup>D</sup>	118.00					
15.8	19.2	13.7	14.9	16.1	13.7	12.6	14.6	14.3	15.3	15.9	16.0	18.7	19.3	17.8	19.4	Bold figures are Value Line estimates		Avg Ann'l P/E Ratio	18.5					
83	1.02	74	79	97	91	80	92	91	86	84	81	98	97	.96	1.05			Relative P/E Ratio	1.05					
4.5%	4.5%	4.7%	4.8%	6.2%	6.8%	5.4%	4.8%	5.3%	4.0%	4.1%	3.9%	3.5%	3.2%	3.5%	3.3%			Avg Ann'l Div'd Yield	3.8%					
CAPITAL STRUCTURE as of 3/31/20																								
Total Debt \$6046.3 mill Due in 5 Yrs \$1578.1 mill		3263.6	3241.4	3301.8	3454.6	3491.6	3495.4	3498.7	3565.3	3691.2	3471.2	3050	3250	Revenues (\$mill)		3700								
LT Debt \$4833.3 mill LT Interest \$198.7 mill		330.4	328.2	387.4	406.1	397.6	437.3	442.0	497.8	511.0	538.3	540	570	Net Profit (\$mill)		680								
Incl \$13.4 mill Palo Verde sale leaseback lessor notes		31.9%	34.0%	36.2%	34.4%	34.2%	34.3%	33.9%	32.5%	20.2%	20.2%	14.0%	14.0%	Income Tax Rate		14.0%								
(LT interest earned 3.2x)		11.7%	12.8%	9.7%	10.0%	11.6%	11.8%	14.1%	13.9%	15.2%	9.3%	7.0%	12.0%	AFUDC % to Net Profit		7.0%								
Leases, Uncapitalized Annual rentals \$14.7 mill		45.3%	44.1%	44.6%	40.0%	41.0%	43.0%	45.6%	48.9%	47.0%	47.1%	53.0%	53.0%	Long-Term Debt Ratio		53.5%								
Pension Assets-12/19 \$3318.4 mill		54.7%	55.9%	55.4%	60.0%	59.0%	57.0%	54.4%	51.1%	53.0%	52.9%	47.0%	47.0%	Common Equity Ratio		46.5%								
Oblig \$3613.1 mill		6729.1	6840.9	7171.9	6990.9	7398.7	8046.3	8825.4	9796.4	9861.1	10263	11900	12375	Total Capital (\$mill)		14525								
Pfd Stock None		9578.8	9962.3	10396	10889	11194	11809	12714	13445	14030	14523	15150	16100	Net Plant (\$mill)		17900								
Common Stock 112,493,458 shs as of 5/1/20		6.5%	6.4%	6.8%	7.1%	6.4%	6.4%	6.0%	6.1%	6.2%	6.3%	5.5%	5.5%	Return on Total Cap'l		5.5%								
MARKET CAP: \$8.9 billion (Large Cap)		9.0%	8.6%	9.8%	9.7%	9.1%	9.5%	9.2%	9.9%	9.8%	9.9%	9.5%	10.0%	Return on Shr. Equity		10.0%								
		9.0%	8.6%	9.8%	9.7%	9.1%	9.5%	9.2%	9.9%	9.8%	9.9%	9.5%	10.0%	Return on Com Equity <sup>E</sup>		10.0%								
<b>ELECTRIC OPERATING STATISTICS</b>		3.1%	2.8%	4.1%	4.1%	3.5%	3.9%	3.5%	4.2%	3.9%	3.8%	3.0%	3.0%	Retained to Com Eq		3.0%								
		66%	68%	58%	58%	62%	59%	62%	58%	60%	61%	67%	68%	All Div'ds to Net Prof		70%								





PORTLAND GENERAL NYSE-POR										RECENT PRICE	42.31	P/E RATIO	18.4	(Trailing: 17.1) (Median: 17.0)	RELATIVE P/E RATIO	0.89	DIV'D YLD	3.8%	VALUE LINE							
TIMELINESS	3	Lowered 6/12/20	High	21.4	22.7	26.0	28.1	33.3	40.3	41.0	45.2	50.1	50.4	58.4	63.1				Target Price Range							
SAFETY	2	Raised 5/4/12	Low	13.5	17.5	21.3	24.3	27.4	29.0	33.0	35.3	42.4	39.0	44.0	37.8				2023 2024 2025							
TECHNICAL	3	Lowered 6/12/20	LEGENDS																							
BETA	85	(1.00 = Market)	0.73 x Dividends p sh divided by Interest Rate Relative Price Strength																							
18-Month Target Price Range			Options Yes Shaded area indicates recession																							
Low-High Midpoint (% to Mid)																										
\$34-\$78 \$56 (30%)																										
2023-25 PROJECTIONS																										
High Low			Price	60	Gain	Ann'l Total																				
			Low	45	(+40%)	Return																				
					(+5%)	6%																				
Institutional Decisions																										
			3Q2019	4Q2019	1Q2020	Percent	21																			
			to Buy	151	160	132	shares	14																		
			to Sell	157	159	197	traded	7																		
			Hld's(000)	84892	86645	86455																				
2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	© VALUE LINE PUBL. LLC 23-25								
--	23.14	24.32	27.87	27.89	23.99	23.67	24.06	23.89	23.18	24.29	21.38	21.62	22.54	22.30	23.75	23.45	24.55	Revenues per sh	27.25							
--	4.75	4.64	5.21	4.71	4.07	4.82	4.96	5.15	4.93	6.08	5.37	5.78	6.16	6.65	6.97	7.05	7.55	"Cash Flow" per sh	9.00							
--	1.02	1.14	2.33	1.39	1.31	1.66	1.95	1.87	1.77	2.18	2.04	2.16	2.29	2.37	2.39	2.30	2.55	Earnings per sh <sup>A</sup>	3.00							
--	--	--	68	93	97	1.01	1.04	1.06	1.08	1.10	1.12	1.18	1.26	1.34	1.43	1.52	1.54	1.62	Div'd Decl'd per sh <sup>B</sup> = <sup>†</sup>	1.95						
--	4.08	5.94	7.28	6.12	9.25	5.97	3.98	4.01	8.40	12.87	6.73	6.57	5.77	6.67	6.78	8.50	6.45	Cap'l Spending per sh	6.00							
--	19.15	19.58	21.05	21.64	20.50	21.14	22.07	22.87	23.30	24.43	25.43	26.35	27.11	28.07	28.99	29.70	30.65	Book Value per sh <sup>C</sup>	33.75							
--	62.50	62.50	62.53	62.58	75.21	75.32	75.36	75.56	78.09	78.23	88.79	88.95	89.11	89.27	89.39	89.55	89.65	Common Shs Outst'g <sup>D</sup>	90.00							
--	--	23.4	11.9	16.3	14.4	12.0	12.4	14.0	16.9	15.3	17.7	19.1	20.0	18.4	22.3	22.3	22.3	Avg Ann'l P/E Ratio	17.0							
--	--	1.26	63	98	96	76	78	89	95	81	89	100	1.01	99	1.21	1.21	1.21	Relative P/E Ratio	.95							
--	--	2.5%	3.3%	4.3%	5.4%	5.2%	4.4%	4.1%	3.7%	3.3%	3.3%	3.1%	2.9%	3.3%	2.8%	2.8%	2.8%	Avg Ann'l Div'd Yield	3.8%							
CAPITAL STRUCTURE as of 3/31/20																										
Total Debt \$2654 mill			Due in 5 Yrs \$336 mill																							
LT Debt \$2478 mill			LT Interest \$124 mill																							
Incl. \$135 mill capitalized leases			(LT interest earned 3.0x)																							
Leases, Uncapitalized Annual rentals \$8 mill																										
Pension Assets-12/19 \$695 mill			Oblig \$905 mill																							
Pfd Stock None																										
Common Stock 89,488,773 shs			as of 4/20/20																							
MARKET CAP: \$3.8 billion (Mid Cap)																										
ELECTRIC OPERATING STATISTICS																										
			2017	2018	2019																					
% Change Retail Sales (KWH)			+3.9	-2.5	+1.2																					
Avg Indust Use (MWH)			16041	16207	17827																					
Avg Indust Revs per KWH (¢)			4.94	4.79	4.75																					
Capacity at Peak (Mw)			4743	4859	NA																					
Peak Load, Summer (Mw)			3976	3816	3765																					
Annual Load Factor (%)			NA	NA	NA																					
% Change Customers (yr-end)			+1.3	+1.1	+1.1																					
Fixed Charge Cov (%)			298	266	265																					
ANNUAL RATES			Past	Past	Est'd																					
of change (per sh)			10 Yrs.	5 Yrs	to '23-'25																					
Revenues			-1.5%	-1.0%	3.0%																					
"Cash Flow"			3.5%	4.0%	5.5%																					
Earnings			3.5%	4.0%	4.0%																					
Dividends			4.0%	5.5%	5.5%																					
Book Value			3.0%	3.5%	3.0%																					
Cal-endar			Mar.31	Jun.30	Sep.30	Dec.31	Full Year																			
2017			530	449	515	515	2009																			
2018			493	449	525	524	1991																			
2019			573	460	542	548	2123																			
2020			573	422	550	555	2100																			
2021			580	490	580	575	2200																			
Cal-endar			Mar.31	Jun.30	Sep.30	Dec.31	Full Year																			
2017			82	36	44	67	2.29																			
2018			72	51	59	55	2.37																			
2019			82	28	61	68	2.39																			
2020			91	29	40	70	2.30																			
2021			85	40	55	75	2.55																			
Cal-endar			Mar.31	Jun.30	Sep.30	Dec.31	Full Year																			
2016			30	30	32	32	1.24																			
2017			32	32	34	34	1.32																			
2018			34	34	3625	3625	1.41																			
2019			3625	3625	385	385	1.50																			
2020			385	385																						
2021																										
BUSINESS: Portland General Electric Company (PGE) provides																										
electricity to 899,000 customers in 52 cities in a 4,000-square-mile																										
area of Oregon, including Portland and Salem. The company is in																										
the process of decommissioning the Trojan nuclear plant, which it																										
closed in 1993. Electric revenue breakdown: residential, 47%, com-																										
mercial, 30%, industrial, 9%, other, 14%. Generating sources gas,																										
36%, coal, 19%, wind, 8%, hydro, 6%, purchased, 31%. Fuel costs																										
29% of revenues. '19 reported depreciation rate 3.6%. Has 2,900																										
employees. Chairman Jack E. Davis. President and Chief Executive																										
Officer, Maria M. Pope. Incorporated Oregon. Address 121																										
S.W. Salmon Street, Portland, Oregon 97204. Telephone 503-464-																										
8000. Internet www.portlandgeneral.com																										
crease the dividend in the second																										
quarter. This is noteworthy because this																										
is when the board usually raises the dis-																										
bursement. The directors will review the																										
dividend every quarter, but we think they																										
will be cautious until an economic recovery																										
is clearly under way. We don't know when																										
this will occur, but are estimating a hike																										
in the first quarter of 2021. PGE's target																										
for the payout ratio is 60%-70%.																										
The company cut its capital budget																										
for 2020 and 2021. The reductions were																										
\$145 million for this year and \$30 million																										
for next year. Some of this spending will																										
be deferred until 2022 or later. Two key																										
projects were still on track as of late April:																										
a \$200 million integrated operations center																										
and a \$160 million investment for a																										
one-third stake in a wind project. PGE																										
won't need to issue equity to finance its																										
spending, but has already issued debt.																										
More issuances are likely by yearend.																										
This stock has an average dividend																										
yield, by utility standards. Total return																										
potential is attractive for the 18-month																										
span, but doesn't stand out for the 3- to 5-																										
year period.																										
Paul E. Debbas, CFA																										
July 24, 2020																										
(A) Diluted EPS. Excl nonrecurring losses '13,																										
42c. '17, 13c. Next earnings report due late																										
July. (B) Divs paid mid-Jan, Apr, July, and																										
Oct. (C) Divd reinvestment plan avail. † Share-																										
holder investment plan avail. (D) Incl deferred																										
charges in '19 \$483 mill, \$5.40/sh. (E) In mill																										
(F) Rate base Net orig cost Rate allowed on																										
com. eq. in '19 9.5%, earned on avg com. eq.																										
'19 8.4%. Regulatory Climate Average (F) '05																										
per-share data are pro forma, based on shs																										
outstanding when stock began trading in '06																										
Company's Financial Strength			B++																							
Stock's Price Stability			95																							
Price Growth Persistence			76																							
Earnings Predictability			90																							
To subscribe call 1-800-VALUELINE																										





Southwestern Electric Power Company  
Summary of Risk Premium Models for the  
Proxy Group of Fourteen Electric Companies

	<u>Proxy Group of Fourteen Electric Companies</u>
Predictive Risk Premium Model (PRPM) (1)	10.27 %
Risk Premium Using an Adjusted Total Market Approach (2)	<u>10.80 %</u>
Average	<u><u>10.54 %</u></u>

Notes:

(1) From page 2 of this Schedule.

(2) From page 3 of this Schedule.

Southwestern Electric Power Company  
Indicated ROE  
Derived by the Predictive Risk Premium Model (1)

	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Proxy Group of Fourteen Electric Companies	LT Average Predicted Variance	Spot Predicted Variance	Recommended Variance (2)	GARCH Coefficient	Predicted Risk Premium (3)	Risk-Free Rate (4)	Indicated ROE (5)
ALLETE	0.28%	0.46%	0.28%	2.1192	7.48%	2.09%	9.57%
Alliant Energy	0.27%	0.30%	0.27%	2.6418	8.82%	2.09%	10.91%
Ameren Corp.	0.23%	0.22%	0.23%	1.9633	5.53%	2.09%	7.62%
Duke Energy	0.31%	0.36%	0.31%	1.7551	6.78%	2.09%	8.87%
Edison Int'l	0.43%	0.84%	0.43%	1.4702	7.90%	2.09%	9.99%
Entergy Corp.	0.40%	0.72%	0.40%	2.2346	11.29%	2.09%	13.38%
IDACORP, Inc	0.28%	0.36%	0.28%	2.1772	7.69%	2.09%	9.78%
NorthWestern Corp.	0.34%	0.64%	0.34%	2.4412	10.29%	2.09%	12.38%
OGE Energy	0.31%	0.55%	0.31%	2.1622	8.33%	2.09%	10.42%
Otter Tail Corp.	0.37%	0.49%	0.37%	1.5713	7.28%	2.09%	9.37%
Pinnacle West Capital	0.60%	0.51%	0.60%	1.2494	9.38%	2.09%	11.47%
PNM Resources	0.53%	0.71%	0.53%	1.2825	8.48%	2.09%	10.57%
Portland General	0.26%	0.59%	0.26%	2.0274	6.48%	2.09%	8.57%
Xcel Energy Inc.	0.27%	0.26%	0.27%	2.8017	9.64%	2.09%	11.73%
						Average	10.33%
						Median	10.21%
						Average of Mean and Median	10.27%

Notes

- (1) The Predictive Risk Premium Model uses historical data to generate a predicted variance and a GARCH coefficient. The historical data used are the equity risk premiums for the first available trading month as reported by Bloomberg Professional Service
- (2) Given current market conditions, I recommend using the long-term average predicted variance.
- (3)  $(1 + (\text{Column [3]} * \text{Column [4]})^{12}) - 1$
- (4) From note 2 on page 2 of Schedule DWD-5
- (5) Column [5] + Column [6].

Southwestern Electric Power Company  
Indicated Common Equity Cost Rate  
Through Use of a Risk Premium Model  
Using an Adjusted Total Market Approach

<u>Line No.</u>		<u>Proxy Group of Fourteen Electric Companies</u>
1.	Prospective Yield on Aaa Rated Corporate Bonds (1)	3.03 %
2.	Adjustment to Reflect Yield Spread Between Aaa Rated Corporate Bonds and A Rated Public Utility Bonds	<u>0.61</u> (2)
3.	Adjusted Prospective Yield on A Rated Public Utility Bonds	3.64 %
4.	Adjustment to Reflect Bond Rating Difference of Proxy Group	<u>0.14</u> (3)
5.	Adjusted Prospective Bond Yield	3.78 %
6.	Equity Risk Premium (4)	<u>7.02</u>
7.	Risk Premium Derived Common Equity Cost Rate	<u><u>10.80</u></u> %

- Notes: (1) Consensus forecast of Moody's Aaa Rated Corporate bonds from Blue Chip Financial Forecasts (see pages 10-11 of this Schedule).
- (2) The average yield spread of A rated public utility bonds over Aaa rated corporate bonds of 0.61% from page 4 of this Schedule.
- (3) Adjustment to reflect the A3 Moody's LT issuer rating of the Utility Proxy Group as shown on page 5 of this Schedule. The 0.14% upward adjustment is derived by taking 1/3 of the spread between A2 and Baa2 Public Utility Bonds ( $1/3 * 0.41\% = 0.14\%$ ) as derived from page 4 of this Schedule.
- (4) From page 7 of this Schedule.

Southwestern Electric Power Company  
Interest Rates and Bond Spreads for  
Moody's Corporate and Public Utility Bonds

Selected Bond Yields

	[1]	[2]	[3]
	<u>Aaa Rated Corporate Bond</u>	<u>A Rated Public Utility Bond</u>	<u>Baa Rated Public Utility Bond</u>
Jul-2020	2.03 %	2.56 %	2.93 %
Jun-2020	2.41	3.07	3.44
May-2020	<u>2.49</u>	<u>3.14</u>	<u>3.63</u>
Average	<u>2.31 %</u>	<u>2.92 %</u>	<u>3.33 %</u>

Selected Bond Spreads

A Rated Public Utility Bonds Over Aaa Rated Corporate Bonds:

0.61 % (1)

Baa Rated Public Utility Bonds Over A Rated Public Utility Bonds:

0.41 % (2)

Notes:

(1) Column [2] - Column [1].

(2) Column [3] - Column [2].

Source of Information:

Bloomberg Professional Service

Southwestern Electric Power Company  
Comparison of Long-Term Issuer Ratings for  
Proxy Group of Fourteen Electric Companies

Proxy Group of Fourteen Electric Companies	Moody's		Standard & Poor's	
	Long-Term Issuer Rating		Long-Term Issuer Rating	
	July 2020		July 2020	
	Long-Term Issuer Rating (1)	Numerical Weighting (2)	Long-Term Issuer Rating (1)	Numerical Weighting (2)
ALLETE	A3	7.0	NR	--
Alliant Energy	A3/Baa1	7.5	A/A-	6.5
Ameren Corp.	A3	7.0	BBB+	8.0
Duke Energy	A3	7.0	A-	7.0
Edison Int'l	Baa2	9.0	BBB	9.0
Entergy Corp.	Baa1/Baa2	8.5	A-	7.0
IDACORP, Inc.	A3	7.0	BBB	9.0
NorthWestern Corp.	NR	--	NR	--
OGE Energy	A3	7.0	A-	7.0
Otter Tail Corp.	A3	7.0	BBB+	8.0
Pinnacle West Capital	A2	6.0	A-	7.0
PNM Resources	Baa1	8.0	BBB+/BBB	8.5
Portland General	A3	7.0	BBB+	8.0
Xcel Energy Inc.	A3	7.0	A-	7.0
Average	A3	7.3	BBB+	7.7

Notes:

- (1) Ratings are that of the average of each company's utility operating subsidiaries.  
(2) From page 6 of this Schedule.

Source Information: Moody's Investors Service  
Standard & Poor's Global Utilities Rating Service

Numerical Assignment for  
Moody's and Standard & Poor's Bond Ratings

Moody's Bond Rating	Numerical Bond Weighting	Standard & Poor's Bond Rating
Aaa	1	AAA
Aa1	2	AA+
Aa2	3	AA
Aa3	4	AA-
A1	5	A+
A2	6	A
A3	7	A-
Baa1	8	BBB+
Baa2	9	BBB
Baa3	10	BBB-
Ba1	11	BB+
Ba2	12	BB
Ba3	13	BB-
B1	14	B+
B2	15	B
B3	16	B-

Southwestern Electric Power Company  
Judgment of Equity Risk Premium for  
Proxy Group of Fourteen Electric Companies

<u>Line No.</u>		<u>Proxy Group of Fourteen Electric Companies</u>
1.	Calculated equity risk premium based on the total market using the beta approach (1)	9.42 %
2.	Mean equity risk premium based on a study using the holding period returns of public utilities with A rated bonds (2)	5.77
3.	Predicted Equity Risk Premium Based on Regression Analysis of 1,167 Fully-Litigated Electric Utility Rate Cases	<u>5.88</u>
4.	Average equity risk premium	<u><u>7.02 %</u></u>

Notes: (1) From page 8 of this Schedule.  
(2) From page 12 of this Schedule.  
(3) From page 13 of this Schedule.



Southwestern Electric Power Company  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for the  
Proxy Group of Fourteen Electric Companies

<u>Line No.</u>	<u>Equity Risk Premium Measure</u>	<u>Proxy Group of Fourteen Electric Companies</u>
<u>Ibbotson-Based Equity Risk Premiums:</u>		
1.	Ibbotson Equity Risk Premium (1)	5.78 %
2.	Regression on Ibbotson Risk Premium Data (2)	9.34
3.	Ibbotson Equity Risk Premium based on PRPM (3)	9.55
4.	Equity Risk Premium Based on Value Line Summary and Index (4)	13.50
5.	Equity Risk Premium Based on Value Line S&P 500 Companies (5)	10.63
6.	Equity Risk Premium Based on Bloomberg S&P 500 Companies (6)	<u>10.72</u>
7.	Conclusion of Equity Risk Premium	9.92 %
8.	Adjusted Beta (7)	<u>0.95</u>
9.	Forecasted Equity Risk Premium	<u><u>9.42 %</u></u>

Notes provided on page 9 of this Schedule.

Southwestern Electric Power Company  
Derivation of Equity Risk Premium Based on the Total Market Approach  
Using the Beta for the  
Proxy Group of Fourteen Electric Companies

Notes:

- (1) Based on the arithmetic mean historical monthly returns on large company common stocks from Ibbotson® SBBI® 2020 Market Report minus the arithmetic mean monthly yield of Moody's average Aaa and Aa corporate bonds from 1926-2019.
- (2) This equity risk premium is based on a regression of the monthly equity risk premiums of large company common stocks relative to Moody's average Aaa and Aa rated corporate bond yields from 1928-2019 referenced in Note 1 above.
- (3) The Predictive Risk Premium Model (PRPM) is discussed in the accompanying direct testimony. The Ibbotson equity risk premium based on the PRPM is derived by applying the PRPM to the monthly risk premiums between Ibbotson large company common stock monthly returns and average Aaa and Aa corporate monthly bond yields, from January 1928 through July 2020.
- (4) The equity risk premium based on the Value Line Summary and Index is derived by subtracting the average consensus forecast of Aaa corporate bonds of 3.03% (from page 3 of this Schedule) from the projected 3-5 year total annual market return of 16.53% (described fully in note 1 on page 2 of Schedule DWD-5).
- (5) Using data from Value Line for the S&P 500, an expected total return of 13.66% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.03% results in an expected equity risk premium of 10.63%.
- (6) Using data from the Bloomberg Professional Service for the S&P 500, an expected total return of 13.75% was derived based upon expected dividend yields and long-term earnings growth estimates as a proxy for capital appreciation. Subtracting the average consensus forecast of Aaa corporate bonds of 3.03% results in an expected equity risk premium of 10.72%.
- (7) Average of mean and median beta from page 1 of Schedule DWD-5.

Sources of Information:

Stocks, Bonds, Bills, and Inflation - 2020 SBBI Yearbook, John Wiley & Sons, Inc.  
Industrial Manual and Mergent Bond Record Monthly Update.  
Value Line Summary and Index  
Blue Chip Financial Forecasts, June 1, 2020 and July 31, 2020  
Bloomberg Professional Service

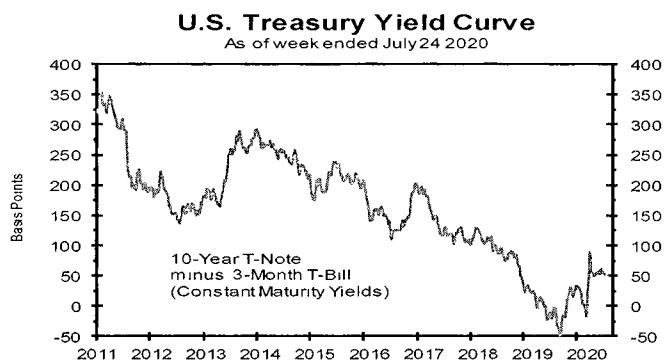
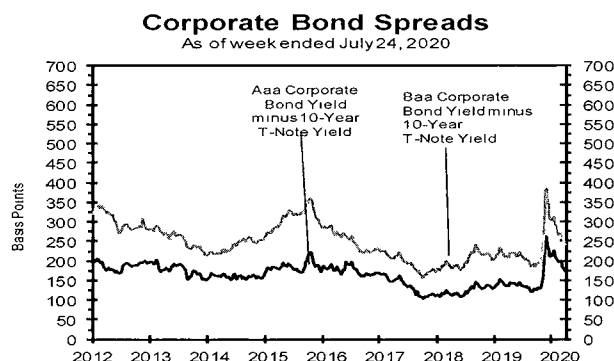
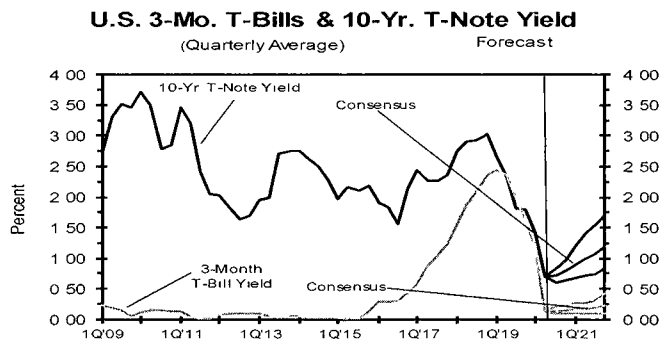
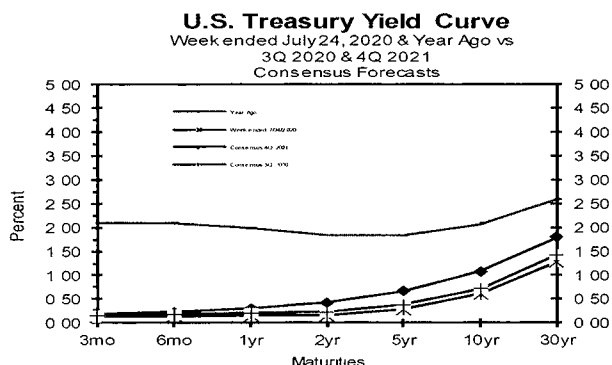
## Consensus Forecasts of U.S. Interest Rates and Key Assumptions

Interest Rates	History								Consensus Forecasts-Quarterly Avg.					
	Average For Week Ending				Average For Month				3Q 2020	4Q 2020	1Q 2021	2Q 2021	3Q 2021	4Q 2021
	Jul 24	Jul 17	Jul 10	Jul 3	Jun	May	Apr	2Q 2020	2020	2020	2021	2021	2021	2021
Federal Funds Rate	0.09	0.09	0.09	0.08	0.08	0.05	0.05	0.06	0.1	0.1	0.1	0.1	0.1	0.1
Prime Rate	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.3	3.3	3.3	3.3	3.3	3.3
LIBOR, 3-mo	0.25	0.27	0.27	0.30	0.31	0.40	1.09	0.60	0.4	0.4	0.4	0.4	0.5	0.5
Commercial Paper, 1-mo	0.12	0.12	0.12	0.11	0.12	0.13	0.47	0.24	0.2	0.2	0.2	0.2	0.3	0.3
Treasury bill, 3-mo	0.12	0.13	0.14	0.15	0.16	0.13	0.14	0.14	0.1	0.2	0.2	0.2	0.2	0.2
Treasury bill, 6-mo	0.14	0.14	0.16	0.17	0.18	0.15	0.17	0.17	0.2	0.2	0.2	0.2	0.2	0.3
Treasury bill, 1 yr	0.15	0.15	0.15	0.16	0.18	0.16	0.18	0.17	0.2	0.2	0.2	0.3	0.3	0.4
Treasury note, 2 yr	0.15	0.15	0.16	0.16	0.19	0.17	0.22	0.19	0.2	0.3	0.3	0.3	0.4	0.5
Treasury note, 5 yr	0.27	0.29	0.30	0.29	0.34	0.34	0.39	0.36	0.4	0.4	0.5	0.6	0.7	0.8
Treasury note, 10 yr	0.60	0.63	0.66	0.67	0.73	0.67	0.66	0.69	0.7	0.8	0.9	1.0	1.1	1.2
Treasury note, 30 yr	1.28	1.32	1.37	1.42	1.49	1.38	1.27	1.38	1.4	1.5	1.6	1.7	1.8	1.9
Corporate Aaa bond	2.34	2.43	2.50	2.64	2.73	2.85	2.86	2.81	2.4	2.5	2.6	2.7	2.7	2.8
Corporate Baa bond	3.02	3.14	3.22	3.34	3.44	3.69	3.87	3.67	3.6	3.7	3.8	3.8	3.9	3.9
State & Local bonds	2.94	3.00	3.05	3.07	3.10	3.33	3.41	3.28	2.5	2.5	2.6	2.6	2.7	2.8
Home mortgage rate	3.01	2.98	3.03	3.07	3.16	3.23	3.31	3.23	3.1	3.1	3.1	3.2	3.2	3.3

Key Assumptions	History								Consensus Forecasts-Quarterly					
	3Q 2018	4Q 2018	1Q 2019	2Q 2019	3Q 2019	4Q 2019	1Q 2020	2Q 2020	3Q 2020	4Q 2020	1Q 2021	2Q 2021	3Q 2021	4Q 2021
	2018	2018	2019	2019	2019	2019	2020	2020	2020	2020	2021	2021	2021	2021
Fed's AFE \$ Index	107.8	109.4	109.4	110.3	110.5	110.3	111.2	112.4	109.7	109.7	109.7	109.5	109.3	109.1
Real GDP	2.1	1.3	2.9	1.5	2.6	2.4	-5.0	-32.9	18.4	6.7	5.8	4.7	4.0	3.4
GDP Price Index	1.8	1.8	1.2	2.5	1.5	1.4	1.4	-1.8	1.5	1.3	1.5	1.6	1.7	1.7
Consumer Price Index	2.1	1.3	0.9	3.0	1.8	2.4	1.2	-3.5	2.5	1.7	1.9	1.7	2.0	2.0

Forecasts for interest rates and the Federal Reserve's Major Currency Index represent averages for the quarter. Forecasts for Real GDP, GDP Price Index and Consumer Price Index are seasonally-adjusted annual rates of change (saar). Individual panel members' forecasts are on pages 4 through 9. Historical data: Treasury rates from the Federal Reserve Board's H 15, AAA-AA and A-BBB corporate bond yields from Bank of America-Merrill Lynch and are 15+ years, yield to maturity, State and local bond yields from Bank of America-Merrill Lynch, A-rated, yield to maturity, Mortgage rates from Freddie Mac, 30-year, fixed, LIBOR quotes from Intercontinental Exchange. All interest rate data are sourced from Haver Analytics. Historical data for Fed's Major Currency Index are from FRSR H 10. Historical data for Real GDP and GDP Chained Price Index are from the Bureau of Economic Analysis (BEA). Consumer Price Index (CPI) history is from the Department of Labor's Bureau of Labor Statistics (BLS).



## Long-Range Survey:

The table below contains the results of our twice-annual long-range CONSENSUS survey. There are also Top 10 and Bottom 10 averages for each variable. Shown are consensus estimates for the years 2021 through 2026 and averages for the five-year periods 2022-2026 and 2027-2031. Apply these projections cautiously. Few if any economic, demographic and political forces can be evaluated accurately over such long time spans.

		Average For The Year					Five-Year Averages		
		2021	2022	2023	2024	2025	2026	2022-2026	2027-2031
1 Federal Funds Rate	CONSENSUS	0.2	0.4	1.0	1.6	1.9	2.1	1.4	2.3
	Top 10 Average	0.4	0.8	1.6	2.2	2.5	2.7	1.9	2.8
	Bottom 10 Average	0.1	0.1	0.4	1.0	1.3	1.5	0.9	1.7
2 Prime Rate	CONSENSUS	3.4	3.6	4.1	4.7	5.0	5.2	4.5	5.4
	Top 10 Average	3.5	3.9	4.6	5.3	5.5	5.7	5.0	5.9
	Bottom 10 Average	3.3	3.3	3.7	4.2	4.5	4.7	4.1	4.9
3 LIBOR, 3-Mo	CONSENSUS	0.6	0.9	1.4	2.0	2.3	2.4	1.8	2.6
	Top 10 Average	0.8	1.3	1.9	2.5	2.7	3.0	2.3	3.1
	Bottom 10 Average	0.4	0.5	0.9	1.6	1.9	2.0	1.4	2.1
4 Commercial Paper, 1-Mo	CONSENSUS	0.6	0.9	1.4	2.0	2.2	2.3	1.7	2.6
	Top 10 Average	0.7	1.2	1.8	2.3	2.6	2.8	2.1	3.0
	Bottom 10 Average	0.3	0.5	1.1	1.6	1.9	2.0	1.4	2.2
5 Treasury Bill Yield, 3-Mo	CONSENSUS	0.2	0.5	1.1	1.6	1.9	2.1	1.4	2.3
	Top 10 Average	0.4	0.9	1.6	2.2	2.4	2.6	1.9	2.8
	Bottom 10 Average	0.1	0.2	0.5	1.1	1.4	1.6	0.9	1.8
6 Treasury Bill Yield, 6-Mo	CONSENSUS	0.3	0.6	1.1	1.7	2.0	2.2	1.5	2.5
	Top 10 Average	0.4	0.9	1.7	2.3	2.6	2.7	2.0	3.0
	Bottom 10 Average	0.2	0.2	0.6	1.2	1.5	1.7	1.1	1.9
7 Treasury Bill Yield, 1-Yr	CONSENSUS	0.4	0.7	1.3	1.8	2.1	2.3	1.7	2.6
	Top 10 Average	0.5	1.1	1.8	2.4	2.7	2.9	2.2	3.1
	Bottom 10 Average	0.2	0.3	0.7	1.3	1.6	1.8	1.1	2.0
8 Treasury Note Yield, 2-Yr	CONSENSUS	0.5	0.9	1.5	2.0	2.3	2.5	1.8	2.7
	Top 10 Average	0.8	1.3	2.0	2.5	2.9	3.0	2.4	3.3
	Bottom 10 Average	0.3	0.4	0.9	1.4	1.7	2.0	1.3	2.2
9 Treasury Note Yield, 5-Yr	CONSENSUS	0.7	1.1	1.7	2.2	2.5	2.7	2.0	2.9
	Top 10 Average	1.1	1.6	2.3	2.8	3.1	3.3	2.6	3.5
	Bottom 10 Average	0.5	0.7	1.2	1.6	1.8	2.1	1.5	2.3
10 Treasury Note Yield, 10-Yr	CONSENSUS	1.2	1.5	2.1	2.5	2.7	2.9	2.3	3.1
	Top 10 Average	1.5	2.0	2.6	3.1	3.3	3.5	2.9	3.8
	Bottom 10 Average	0.8	1.1	1.6	1.9	2.1	2.2	1.8	2.5
11 Treasury Bond Yield, 30-Yr	CONSENSUS	1.8	2.2	2.7	3.1	3.3	3.5	3.0	3.8
	Top 10 Average	2.2	2.7	3.3	3.7	3.9	4.1	3.5	4.4
	Bottom 10 Average	1.4	1.7	2.2	2.6	2.8	2.9	2.4	3.1
12 Corporate Aaa Bond Yield	CONSENSUS	2.8	3.2	3.6	4.0	4.2	4.3	3.9	4.6
	Top 10 Average	3.1	3.6	4.2	4.6	4.7	4.8	4.4	5.1
	Bottom 10 Average	2.4	2.7	3.1	3.5	3.7	3.8	3.4	4.2
13 Corporate Baa Bond Yield	CONSENSUS	4.1	4.5	4.9	5.2	5.3	5.4	5.0	5.7
	Top 10 Average	4.6	5.0	5.4	5.7	5.8	6.0	5.6	6.2
	Bottom 10 Average	3.6	3.9	4.3	4.6	4.7	4.8	4.4	5.2
14 State & Local Bonds Yield	CONSENSUS	2.6	3.0	3.5	3.7	3.8	3.8	3.6	4.1
	Top 10 Average	3.0	3.3	3.9	4.2	4.3	4.4	4.0	4.6
	Bottom 10 Average	2.3	2.6	2.9	3.2	3.2	3.3	3.0	3.7
15 Home Mortgage Rate	CONSENSUS	3.4	3.6	4.0	4.4	4.5	4.7	4.2	4.9
	Top 10 Average	3.8	4.0	4.5	4.8	5.0	5.2	4.7	5.5
	Bottom 10 Average	3.0	3.2	3.5	3.9	4.1	4.1	3.7	4.4
A Fed's AFE Nominal \$ Index	CONSENSUS	112.8	112.6	112.5	111.8	111.4	111.0	111.9	110.6
	Top 10 Average	114.1	114.5	114.1	113.8	113.5	113.4	113.9	113.9
	Bottom 10 Average	111.7	110.7	110.7	110.2	109.5	108.7	110.0	107.6
		Year-Over-Year, % Change					Five-Year Averages		
		2021	2022	2023	2024	2025	2026	2022-2026	2027-2031
B Real GDP	CONSENSUS	3.2	3.2	2.4	2.2	2.1	2.0	2.4	2.1
	Top 10 Average	5.7	4.3	2.9	2.5	2.3	2.3	2.9	2.4
	Bottom 10 Average	0.5	2.2	1.9	1.9	1.8	1.8	1.9	1.8
C GDP Chained Price Index	CONSENSUS	1.1	1.7	1.9	2.0	2.0	2.0	1.9	2.0
	Top 10 Average	1.8	2.2	2.2	2.2	2.3	2.2	2.2	2.2
	Bottom 10 Average	0.3	1.3	1.6	1.8	1.8	1.8	1.7	1.9
D Consumer Price Index	CONSENSUS	1.3	2.0	2.1	2.1	2.1	2.1	2.1	2.2
	Top 10 Average	2.2	2.5	2.3	2.3	2.4	2.3	2.4	2.4
	Bottom 10 Average	0.4	1.5	1.8	1.8	1.9	1.9	1.8	2.0